

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Niki Frenchko, :
 :
Plaintiff, :
 :
vs. : Case No. 4:23-cv-781
 :
Paul Monroe, et al., :
 :
Defendants. :

VIDEOCONFERENCE DEPOSITION OF MICHELE NICOLE FRENCHKO

Deposition taken in the above-titled cause, pursuant to Agreement before Connie M. Willman, RPR, RMR, a Notary Public for the State of Ohio, on Wednesday, October 11, 2023, at 11:10 a.m. to be used pursuant to the Rules of Federal Civil Procedure or by agreement of counsel in the aforesaid cause of action, pending in the United States District Court for the Northern District of Ohio, Eastern Division.

VOLUME II

A P P E A R A N C E S

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APPEARING ON BEHALF OF DEFENDANTS SHERIFF PAUL MONROE,
TRUMBULL COUNTY, TRUMBULL COUNTY BOARD OF COMMISSIONERS,
TRUMBULL COUNTY SHERIFF'S OFFICE, MAURO CANTALAMESSA,
AND FRANK FUDA:

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APPEARING ON BEHALF OF DEFENDANTS HAROLD WIX AND ROBERT
ROSS:

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ALSO PRESENT:

Sergeant Wix
Sergeant Ross

- - -

1 Wednesday Morning Session,

2 October 11, 2023.

3 - - -

4 S T I P U L A T I O N S

5 - - -

6 It is stipulated by and between counsel for the
7 respective parties that the deposition of Michele Nicole
8 Frenchko, Plaintiff herein, called by the Defendants
9 under the applicable Rules of Federal Civil Court
10 Procedure may be taken at this time by the notary
11 pursuant to notice and stipulations of counsel; that
12 said deposition may be reduced to writing in stenotypy
13 by the notary, whose notes may thereafter be transcribed
14 out of the presence of the witness; that proof of the
15 official character and qualification of the notary is
16 waived.

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1 MICHELE NICOLE FRENCHKO

2 being by me first duly sworn, as hereinafter certified,
3 deposes and says as follows:

4 EXAMINATION (Continued)

5 By Mr. Downey:

6 Q. Commissioner Frenchko, the same rules apply that
7 we talked about last time. If you need to take a break,
8 let us know.

9 Please answer the question that's asked using
10 words so that Connie can take it down.

11 And if you need to take a break or something like
12 that, just advise us of that.

13 I'm going to jump around because I don't want to
14 ask questions I asked before. I want to get through
15 this stuff, and so I may bounce around a bit as we
16 start, but that's just to sort of fill in the record.

17 First question, does the Board of Commissioners
18 pass a specific version of Robert's Rules or do they
19 generally adopt Robert's Rules of Order?

20 A. They do not pass a specific version, to the best
21 of my -- I believe that it's just Robert's -- they say
22 Robert's Rules of Order at the reorganizational meeting.

23 Q. Thank you. You typically live stream meetings.
24 When did you start doing that?

1 A. I can't remember when I started live streaming
2 them. I started videotaping some of them, and then -- I
3 don't remember.

4 Q. Is it fair to say that you've been permitted to
5 record public meetings prior to July 7th, 2022?

6 A. Yes, back even when there was COVID and we were
7 sitting in the audience.

8 Q. And would it be fair to say that you were able to
9 live stream the public meeting on July 7th, 2022?

10 A. Yes.

11 Q. And since July 7th, 2022, would it be fair to say
12 you have been permitted to live stream public meetings?

13 A. No, there was an occasion -- I'm sorry, no.

14 Q. Can you tell me about the occasion you were just
15 going to share?

16 A. There was an occasion where we had a budget
17 public meeting, and the sheriff snatched my phone and
18 threw it down, and so that interfered with my live
19 stream.

20 I was making my best effort to, but because it's
21 automatically live streamed and updated, whenever
22 there's a problem with reception, like when he snatched
23 it up and threw it down, it blurped for a moment, there
24 was like a hiccup in the reception or something like

1 that.

2 Q. And we are going to get to that --

3 A. Oh.

4 Q. -- in your testimony today. I appreciate you
5 sharing that with me. But just for clarity of the
6 record, with the exception of what you just described as
7 a brief period when the live stream wasn't working
8 properly, is it fair to say that you've not been
9 prevented from live streaming meetings since July 7th,
10 2022?

11 A. No, there was one other -- no, there was another
12 occasion recently too.

13 Q. Tell me about that.

14 A. They allowed someone to come up to the dais when
15 my camera was there, the clerk allowed it, and they put
16 something in front of the screen in front of my
17 recording device.

18 Q. Did you still record the meeting itself?

19 A. Pretty much I did, but at the same time someone
20 obstructed the view of my camera.

21 Q. Do you recall when it occurred?

22 A. And the other commissioners allowed that.

23 Q. When did that occur?

24 A. I don't remember.

1 Q. Do you recall who was speaking?

2 A. Pardon?

3 Q. Who was speaking at the podium?

4 A. It was -- I don't know because I walked away, and
5 then when I came back in it was down, but I had people
6 who were watching it who noticed something had happened.

7 And then when I went back and looked, I'm
8 assuming that one of the other commissioners
9 eventually -- I don't know what happened because I
10 wasn't in the room and I didn't go back and look at the
11 surveillance video, but someone put something to
12 obstruct my camera. And then it was corrected at some
13 point, but that just happened recently.

14 Q. Did it affect the audio?

15 A. I don't think so, no.

16 Q. And this is to clarify a previous answer, during
17 your last deposition you stated that you interrupted the
18 clerk on July 7th, 2022, because she was reading a
19 letter which was out of order for the agenda. Did you
20 say that the letter was read out of order when it was
21 being read?

22 A. I can't remember exactly what I said. I remember
23 saying something about it because it wasn't on the
24 agenda at all, and so anything that's a public comment

1 is at the end. I do remember saying something, but I
2 don't remember exactly what I said.

3 Q. Did you see either deputy get involved before
4 your arrest?

5 A. I saw the --

6 MR. BETRAS: I'm sorry, could you repeat that
7 question. I didn't quite hear it.

8 Q. Sure. Did you see, observe either deputy receive
9 a call before your arrest on July 7th, 2022?

10 A. I saw one deputy text messaging, but I did not
11 see them pick up the phone. I saw them on their phone,
12 and I saw Mauro on his phone, but I did not see anyone
13 actually talking.

14 Q. So just to be clear, it would be fair to say that
15 you did not observe either deputy receive a call prior
16 to your arrest on July 7th, 2022?

17 MR. BETRAS: I object.

18 But go ahead and answer, Niki.

19 I don't want to give away the answer, Dan,
20 because you'll get mad. The point is that's not what
21 she said.

22 MR. DOWNEY: Mr. Betras, I'm sure --

23 MR. BETRAS: You said they didn't get a call. I
24 think that's an objective fact.

1 MR. DOWNEY: Go ahead and object if you wish,
2 Mr. Betras, I'm fine with that, but it's not
3 objectionable. I asked a very specific question, and I
4 appreciate Ms. Frenchko, Commissioner Frenchko's answer.
5 She testified, it's on the record, that she observed
6 people potentially using their phones. I asked a very
7 specific question, is it fair to say that you did not
8 observe either deputy take a phone call prior to your
9 arrest on July 7th, 2022?

10 MR. BETRAS: That's a different question than
11 what you asked.

12 But go ahead, answer, Nik.

13 A. I saw them -- let me correct this. I saw them on
14 their phones glancing up and down, but I'm working so
15 I'm going over the agenda, and I'm not staring at the
16 deputies, but I did see one of them in particular on his
17 phone during the meeting.

18 Q. And I will ask it again, is it fair to say that
19 you did not observe either deputy make a phone call or
20 receive a phone call prior to your arrest on July 7th,
21 2022?

22 A. I can't be -- honestly, if you're going to ask it
23 that way, I can't be certain as to whether or not I saw
24 them receive or make a phone call because I don't know

1 if they had earbuds in or because it was in the back of
2 the room, they could have been looking at their phones
3 and receiving a phone call that I wasn't aware of.

4 So, like, while they were on the phone it's not
5 fair for me to be able to say, no, they didn't because I
6 don't know if they had earbuds in, but I did see them on
7 their phone. So I can't speak to whether or not a phone
8 call came in to them when I was looking at them. I
9 don't know.

10 Q. Did you observe either officer wearing earbuds at
11 any point in time on July 7th, 2022?

12 A. I couldn't see from where I was sitting.

13 Q. So would the answer be no?

14 A. I don't know because I wasn't able to see from
15 far away.

16 Q. Okay. My question is very specific.

17 A. I wear reading glasses. I could see when I'm
18 reading.

19 Q. So would it be fair to say you did not observe
20 them wearing earbuds that day?

21 A. I don't -- I couldn't tell.

22 Q. Thank you. Now, did you witness any commissioner
23 communicate with any of the deputies prior to your
24 arrest?

1 A. Yes.

2 Q. Tell me about that.

3 A. Mr. Fuda hollered for -- called out Wix's name to
4 arrest me.

5 Q. And when in relation to your arrest do you
6 believe that occurred?

7 A. A few minutes before or a minute. I don't
8 remember. It was within -- it was after -- it was after
9 the clerk was done reading and before I got arrested.

10 Q. And so what were the specific words that as you
11 sit here today you recall Commissioner Fuda uttering in
12 the moments before your arrest?

13 A. I remember him saying "Wix, Wix" like get up
14 here, Wix, I took that as he was calling him.

15 Q. Did he ever use the words "Arrest Commissioner
16 Frenchko"?

17 A. He didn't use those words.

18 Q. Any other communications by any other
19 commissioner prior to your arrest that you believe was
20 that commissioner requesting your arrest that we haven't
21 talked about?

22 A. Mauro said something as well. Mauro said, "You
23 know you could be removed" -- it was concerted because
24 Mauro said "You know you could be removed for disrupting

1 a meeting."

2 And then I remember Frank saying "Wix," and then
3 I got arrested, that's when they came for me.

4 Q. And how much time elapsed between when you
5 believe Commissioner Cantalamessa made that comment to
6 when you were arrested?

7 A. I don't know. I don't know the time frame
8 between after the letter was read and when I was
9 arrested.

10 I know that I started making additional
11 criticisms of the sheriff about another person who I
12 believe passed away or something, and then that's
13 whenever they came up. It sounded like it was within a
14 few -- I don't know. I can't tell you the time frame.
15 I know it was a short time frame because they gave me an
16 opportunity to apologize, and when I didn't and I
17 doubled down on my position, then both of them said what
18 they said and they came and arrested me.

19 Q. And did Commissioner Cantalamessa ever use words
20 to the effect of "Arrest Commissioner Frenchko"?

21 A. He said "You could be removed" as I believe -- I
22 think they were closing in too because the sheriffs were
23 in the back or the deputies, and then they started
24 coming up, so as they were closing in that's whenever

1 they said it.

2 Q. Are you able or do you distinguish between the
3 words arrest and remove?

4 A. I mean, it's not the first time that's happened.
5 I know Commissioner Fuda has in the past said "Get this
6 girl out of here, shut this girl up."

7 They cut the meetings off early to stop me from
8 talking, like, automatically let's make a motion and a
9 second to adjourn and leave so that we can stop her from
10 talking.

11 So that's like a common theme for them to say she
12 needs removed, she needs quieted, she needs shut up, she
13 needs silenced. So that's a common theme, but I don't
14 recall them ever actually saying arrest, but that's the
15 first time they called a deputy by name when the
16 deputies weren't even attending our meetings.

17 Q. So just so that I'm clear, Commissioner Frenchko,
18 I believe you live streamed and have a video of the
19 events surrounding your arrest on July 7th, 2022; is
20 that correct?

21 A. Yeah.

22 Q. And if I represented to you that in that video
23 that neither Commissioner Fuda nor Commissioner
24 Cantalamessa uttered the words "Arrest Commissioner

1 Frenchko" would you have any reason to disagree with
2 that statement?

3 A. No reason to disagree with them saying arrest me.
4 That would be quite overt.

5 Q. So the answer would be --

6 A. They had to be more subtle.

7 Q. -- they did not utter those words?

8 A. Yeah.

9 Q. I'm going to ask you a few questions about your
10 arrest generally. Would it be fair to say that you were
11 walked over to the jail?

12 A. Yes.

13 Q. Did you go through the booking process?

14 A. Yes.

15 Q. Were you --

16 A. It was delayed, though. It was really delayed.

17 THE REPORTER: I'm sorry --

18 Q. I'm sorry, ma'am, just for the record, I thought
19 you were done answering. I apologize. I was looking at
20 my sheet.

21 A. I'm sorry, go ahead.

22 Q. We want to make sure we don't talk over each
23 other so that Ms. Willman can take it all down.

24 Was there something else you wished to share?

1 A. No.

2 Q. Did they ask you about any medical or physical
3 injuries at the jail?

4 A. I don't remember them asking me. I don't
5 remember them asking me at the jail. When they arrested
6 me I told them about an injury and a medical condition,
7 and they just kept on ignoring me, but --

8 Q. Is it fair to say that you did not suffer any
9 medical or physical injury as a result of your arrest on
10 July 7th, 2022?

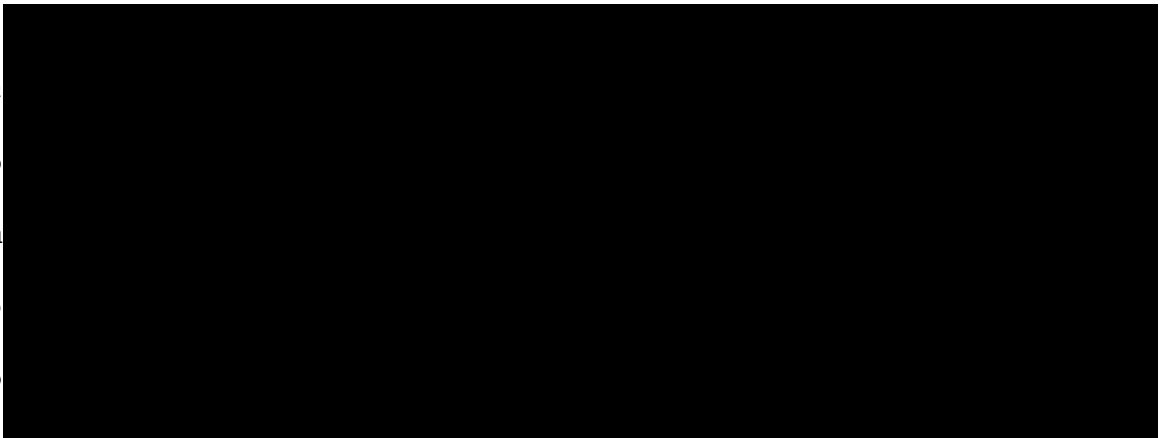
11 MR. BETRAS: Dan, I'm sorry, can you just repeat
12 the first part of that question?

13 Q. Sure. Is it fair to say that you did not suffer
14 any medical or physical injury as a result of the arrest
15 on July 7th, 2022?

16 A. No.

17 Q. What physical injury are you alleging out of the
18 arrest on July 7th, 2022?

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4 Q. Did you seek any medical treatment for your
5 shoulder following the arrest on July 7th, 2022?

6 A. No.

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9 Q. Is it fair to say that the officer who cuffed you
10 loosened the cuffs

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12 A. Yes,

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14 Q. Would it be fair to say that you posted bond the
15 same day?

16 A. Yes.

17 Q. Now, were you embarrassed by the arrest?

18 A. Yes.

19 Q. And tell me in what way you were embarrassed by
20 the arrest.

21 A. And by the way, that was something medical, and
22 they shouldn't be on there, and if you're going to start
23 asking me -- I'm sorry, my attorney should be --

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MR. BETRAS: You didn't really say anything other

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1 when Andrew's crossing on the event, I'm fine with
2 however people want to do it, but I kind of have an
3 outline. I tried to keep all this stuff in one place.
4 That's kind of the next question.

5 MR. BETRAS: Well, I think that if you're going
6 to ask her about her emotions, I would at this point ask
7 that the sheriff's deputies step out and then they can
8 come back in.

9 MR. DOWNEY: Are you fine with that, Andrew?

10 MR. YOSOWITZ: Hang on. I'm fine with it. Let
11 me tell them.

12 (Sergeant Ross and Sergeant Wix leave the ZOOM
13 deposition.)

14 MR. DOWNEY: I guess we can go off the record
15 again.

16 (Off the record.)

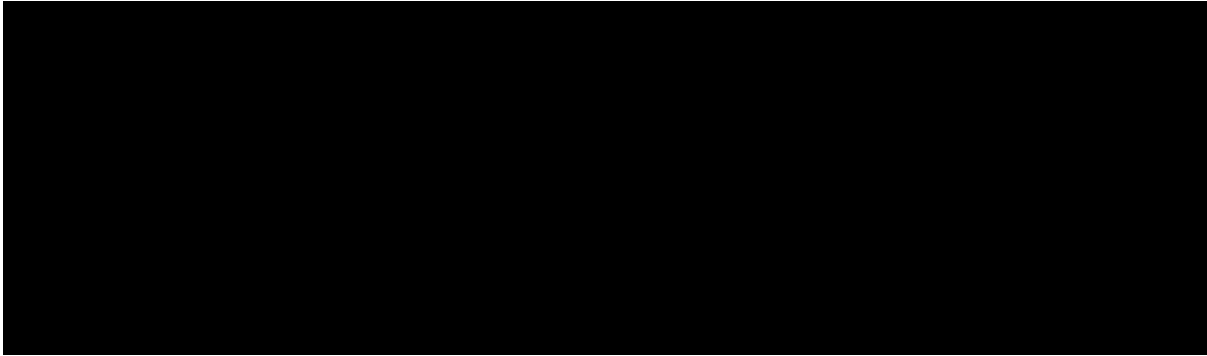
17 Q. (By Mr. Downey) Let's get started. How did this
18 incident make you feel fearful, Commissioner Frenchko?

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1 Q. Were some of those fears assuaged when you posted
2 bond that day?

3 A. 

4 Q. So just --

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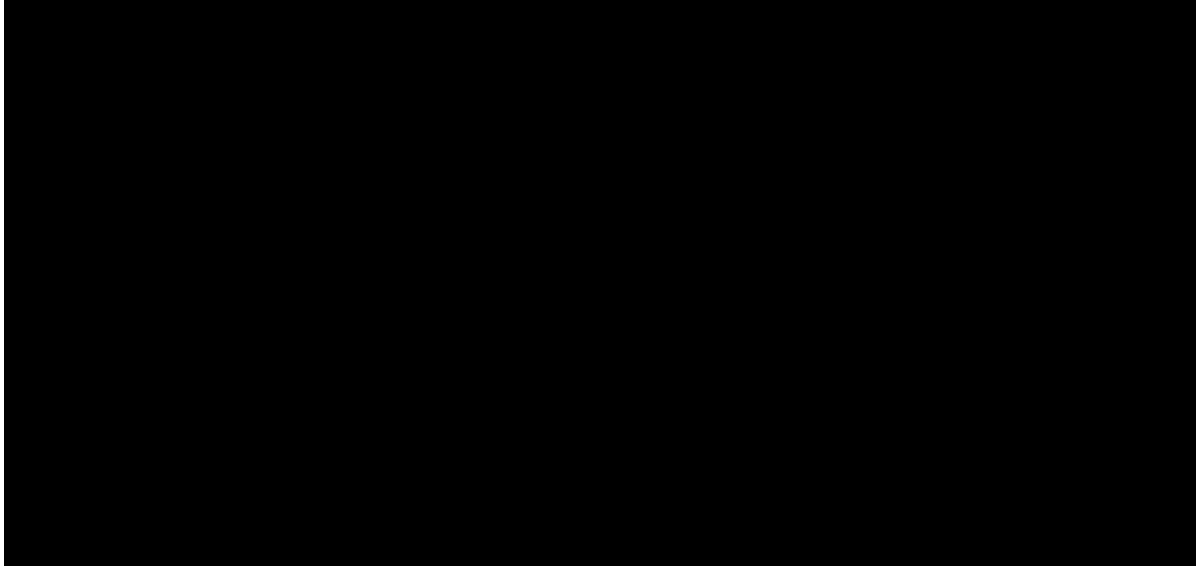
10 Q. Did you come to learn --

11 THE WITNESS: David, can you get off Instagram.

12 MR. BETRAS: Niki, I'm fine. I can hear what's
13 going on.

14 THE WITNESS: We can hear your reels.

15 MR. BETRAS: I'll put my mute on.

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24 THE REPORTER: Dan, hey, Dan, you guys froze for

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MR. BETRAS: Niki, repeat the last part of what you said for the court reporter about your condition. She didn't hear that.

MR. BETRAS: No, you were explaining a condition. I don't think the court reporter caught that.

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[REDACTED]

Q. Commissioner Frenchko, if I may, how much time did you spend from your arrest to when you were released, how much time did that take?

[REDACTED]

Q. I understand, and I want to get back on because I've got a lot of other questions to ask you and I just want to confirm something.

[REDACTED]

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8 Q. I don't think you're hearing my question.

9 MR. BETRAS: Niki, answer his question.

10 A. No.

11 MR. BETRAS: Listen to his question. Listen to
12 his question again and answer it. You can answer his
13 question correctly. Listen to it.

14 Go ahead, Dan.

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20 Q. So is it fair to say that you were not offered
21 water at the jail?

22 A. No.

23 Q. So they're both nos. Is it fair to say that the
24 entire amount of time from your arrest to your release

1 per your testimony was a couple of hours?

2 A. I can't remember exactly.

3 Q. Okay. So if you testified earlier that it was a
4 couple of hours, would that be a false statement or a
5 true statement?

6 A. It was an estimate based on the best of my
7 recollection, but I don't want to be pinned down to a
8 time because I don't know exactly.

9 Q. Was it still light out when you left the jail?

10 A. Yes.

11 Q. And it was the same day that you were arrested?

12 A. Yes.

13 Q. And did you return to the Trumbull County
14 courthouse where the commissioners' meetings are held
15 following the arrest?

16 A. Yes.

17 Q. And were the employees still present when you
18 returned to the commissioners' offices?

19 A. Yes.

20 Q. And do you recall what time of the day you were
21 arrested?

22 A. 11:00, maybe 11:00 something.

23 Q. And what time are employees -- does their workday
24 end in the commissioners' office?

1 A. 4:30.

2 Q. Now, would it be fair to say that you posted to
3 social media about your arrest?

4 A. Yes.

5 Q. Did you post to social media about your arrest
6 numerous times?

7 A. Yes, I think. I can't remember how many times.

8 Q. More than once?

9 A. Probably, yeah.

10 Q. Is it fair to say that you advertised the sale of
11 T-shirts with your mugshot on it?

12 A. Yes.

13 Q. Why did you do that?

14 A. Some person who gave me political advice because
15 I was very upset and embarrassed and didn't know how to
16 handle what was going on said, well, there's nothing you
17 could do, just lean into it, do this, and then someone
18 made a thing that said free Niki, and I was taking
19 advice from other people on how to best combat the
20 negativity associated with what the media was doing.

21 Q. And do you recall who provided you with this
22 advice?

23 A. There was a guy named Tex.

24 Q. Does he have a last name?

1 A. Tex Fisher.

2 Q. Is he somebody that assists you with political
3 campaigns or political issues and things of that nature?

4 A. He gives me advice.

5 Q. Is he paid for any sort of campaign process or
6 anything like that?

7 A. I have not paid him. I didn't pay him.

8 Q. Did you make the ultimate decision to sell the
9 T-shirts with your mugshot on it?

10 A. I didn't sell any T-shirts.

11 Q. Okay. Did you make the decision to advertise the
12 sale of T-shirts with your mugshot on it yourself?

13 A. Yeah, I took his advice.

14 Q. But it was ultimately your decision?

15 A. Yes. Oh, yeah.

16 Q. Is it fair to say that you issued a press release
17 several days after your arrest which included your
18 mugshot?

19 A. Yes, that was -- yes.

20 Q. Why did you do that?

21 A. I don't know that it included -- I can't
22 remember. I can't remember what all was included in it,
23 but that was also at the advice of Tex.

24 Q. Did you actually have any T-shirts with your

1 mugshot on it made?

2 A. No.

3 Q. So would it be correct to say that if you didn't
4 have them made you didn't give them away?

5 A. I didn't have them made. I didn't give any away.

6 Q. Who is Thomas Payne?

7 A. He is a person who wanted to make -- wanted to
8 make shirts or at least try to frame me in a better
9 light given the situation of the arrest and made a shirt
10 for someone and then said can you come and meet me here
11 so that I can take a picture of you with it because he
12 was trying to help me to overcome that stigma associated
13 with the arrest.

14 Q. I think we've got an exhibit we're going to show
15 you, Commissioner Frenchko. It will take a second to
16 get it up on the screen.

17 If we can get to it, we'll do it later. It's
18 always kind of a challenge to get the exhibits on these
19 things.

20 A. I'm sure I know what it is.

21 Q. Did you solicit the campaign while referencing
22 your arrest?

23 A. Yes.

24 Q. Why?

1 A. Again, it was advice -- it was an opportunity for
2 me to help to change the narrative associated with the
3 arrest so in order to put things out there and try my
4 best based on political advisors to mention it and try
5 to raise money, that's what I tried to do.

6 It just gave an opportunity to give a different
7 account of the events and what the media and the sheriff
8 and the powers that are trying to remove me from office
9 and silence me are promoting.

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15 Q. Did you ever seek the care of any healthcare
16 practitioner regarding being embarrassed, fearful or any
17 emotional trauma that you relate to this arrest on
18 July 7th, 2022?

19 A. No, no, not to my memory.

20 Q. Who is your primary care physician?

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22 Q. And so how often do you see your primary care
23 physician?

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9 Q. In the past have you ever been diagnosed with
10 anxiety disorder?

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A. [REDACTED]

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Q. Have you ever experienced any symptoms of anxiety
disorder?

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A. [REDACTED]

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[REDACTED]

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10 Q. I don't want to interrupt you, but I do want to
11 clarify, was this before the arrest?

12 A. This is after the arrest.

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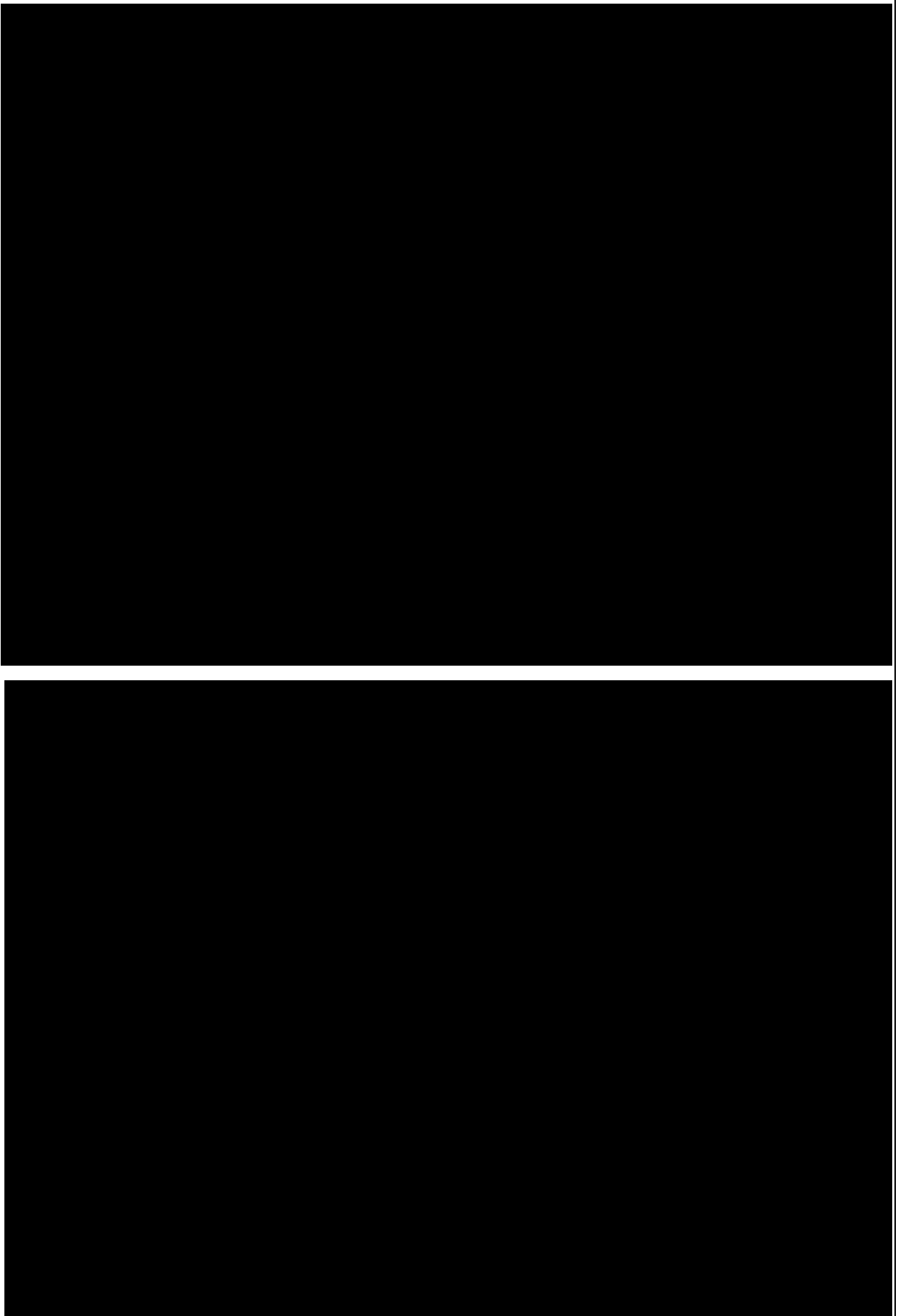
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20 Q. Have you ever treated with a healthcare
21 practitioner regarding panic attacks, anxiety, PTSD or
22 any other mental health issue prior to July 7th, 2022?

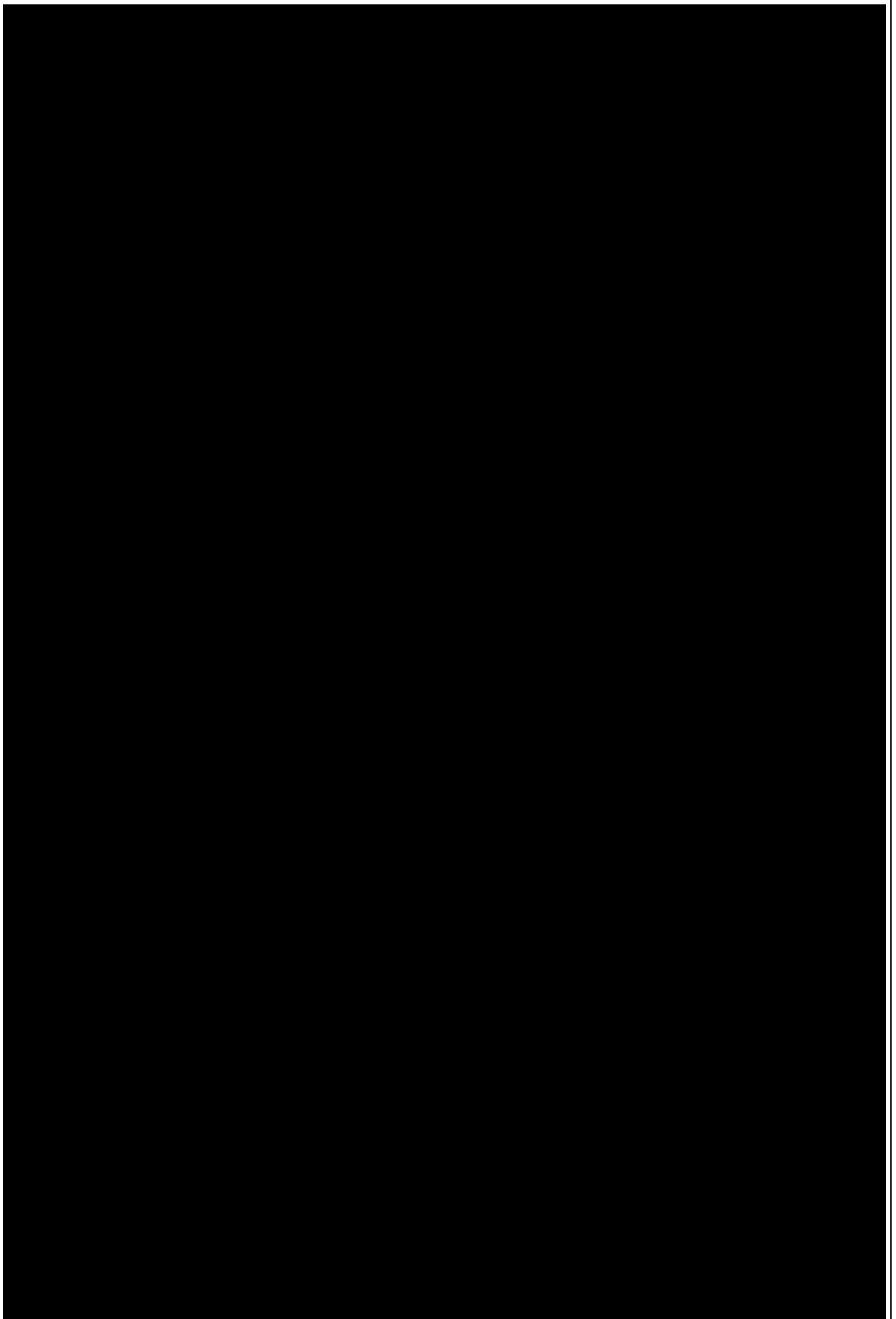
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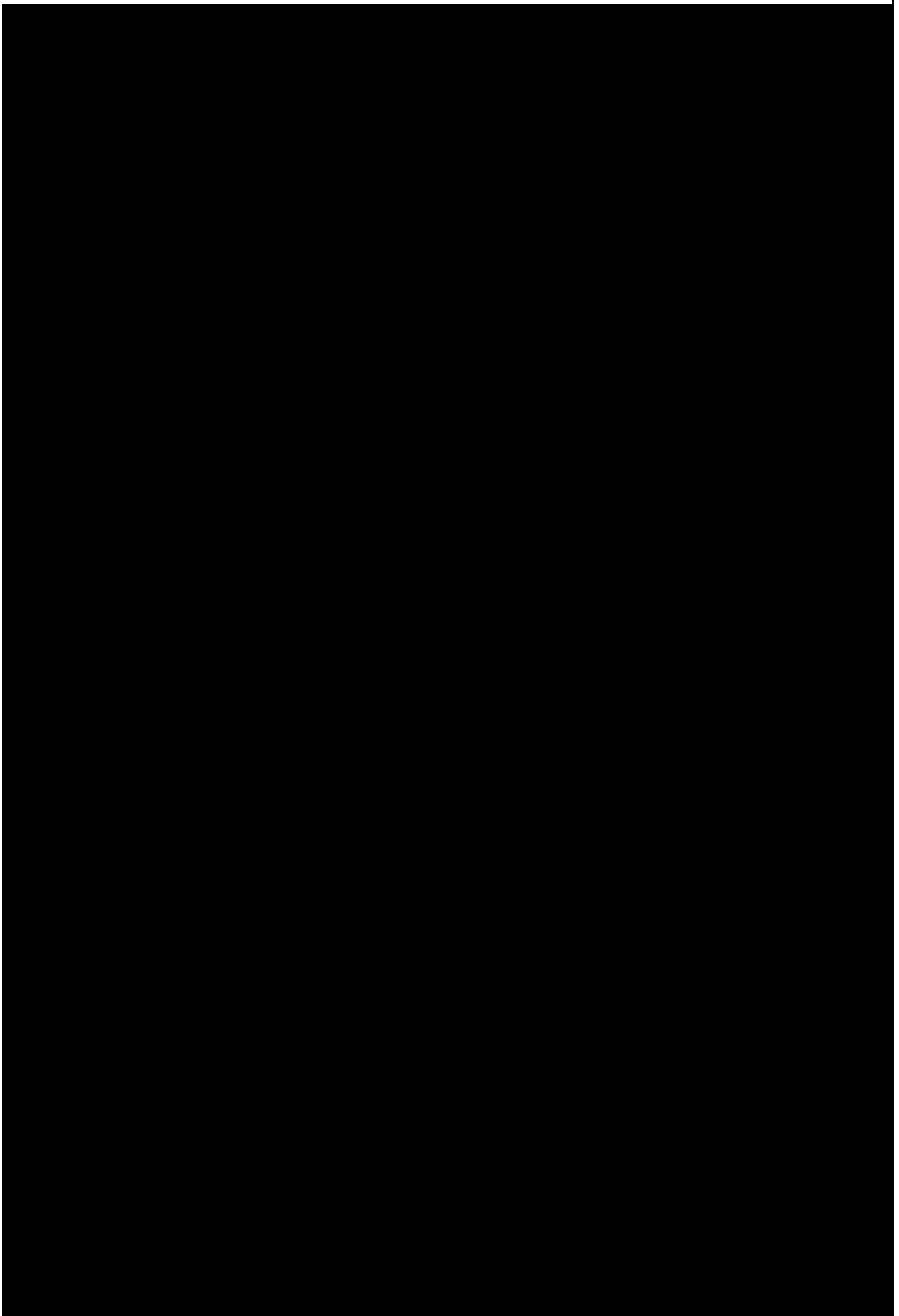
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[REDACTED]

Q. I understand. I guess what I want to ask you is has any healthcare practitioner made any diagnosis regarding mental health conditions with respect to you since July 7th, 2022?

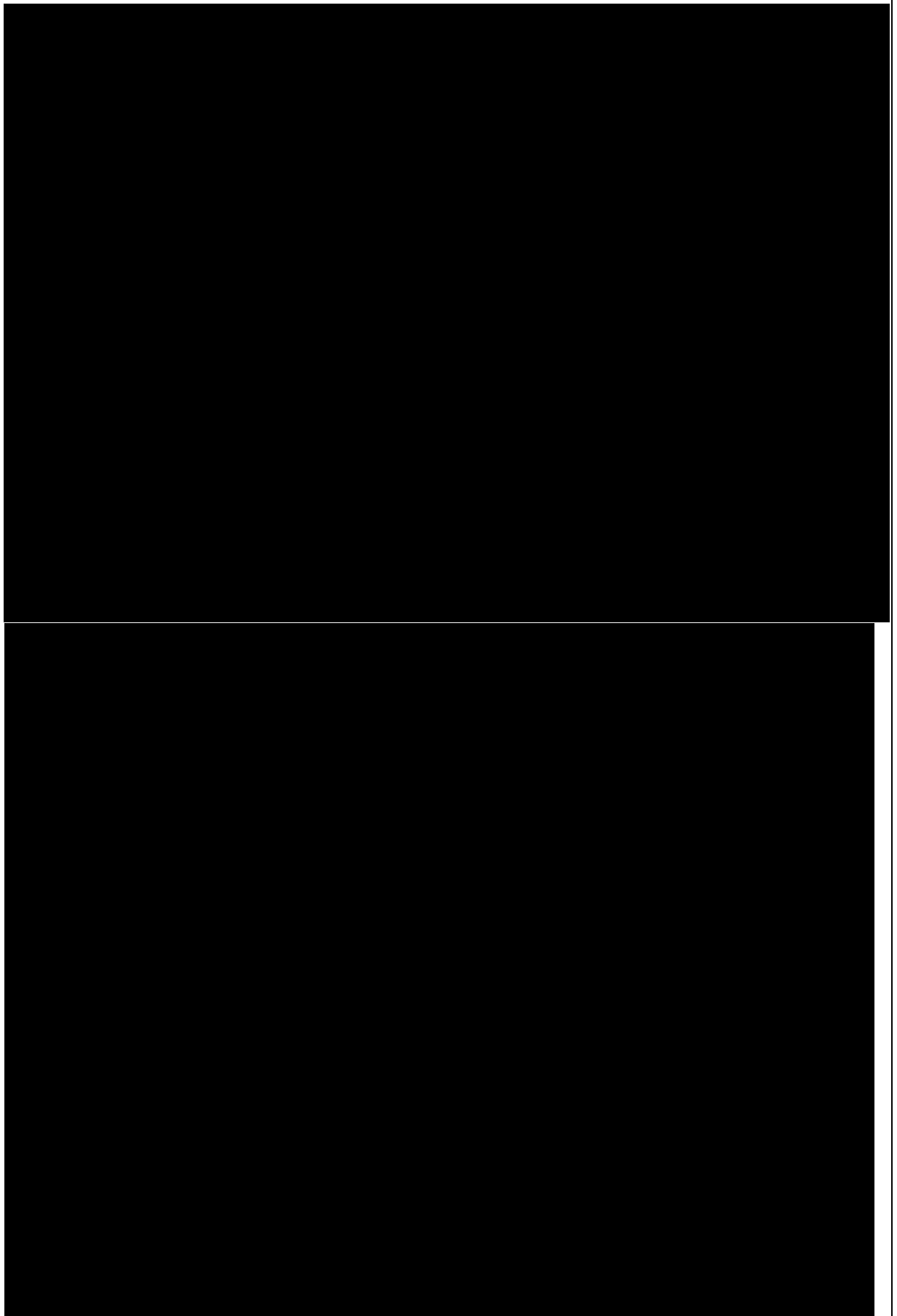
A. I have not sought anything.

Q. So would that be no?

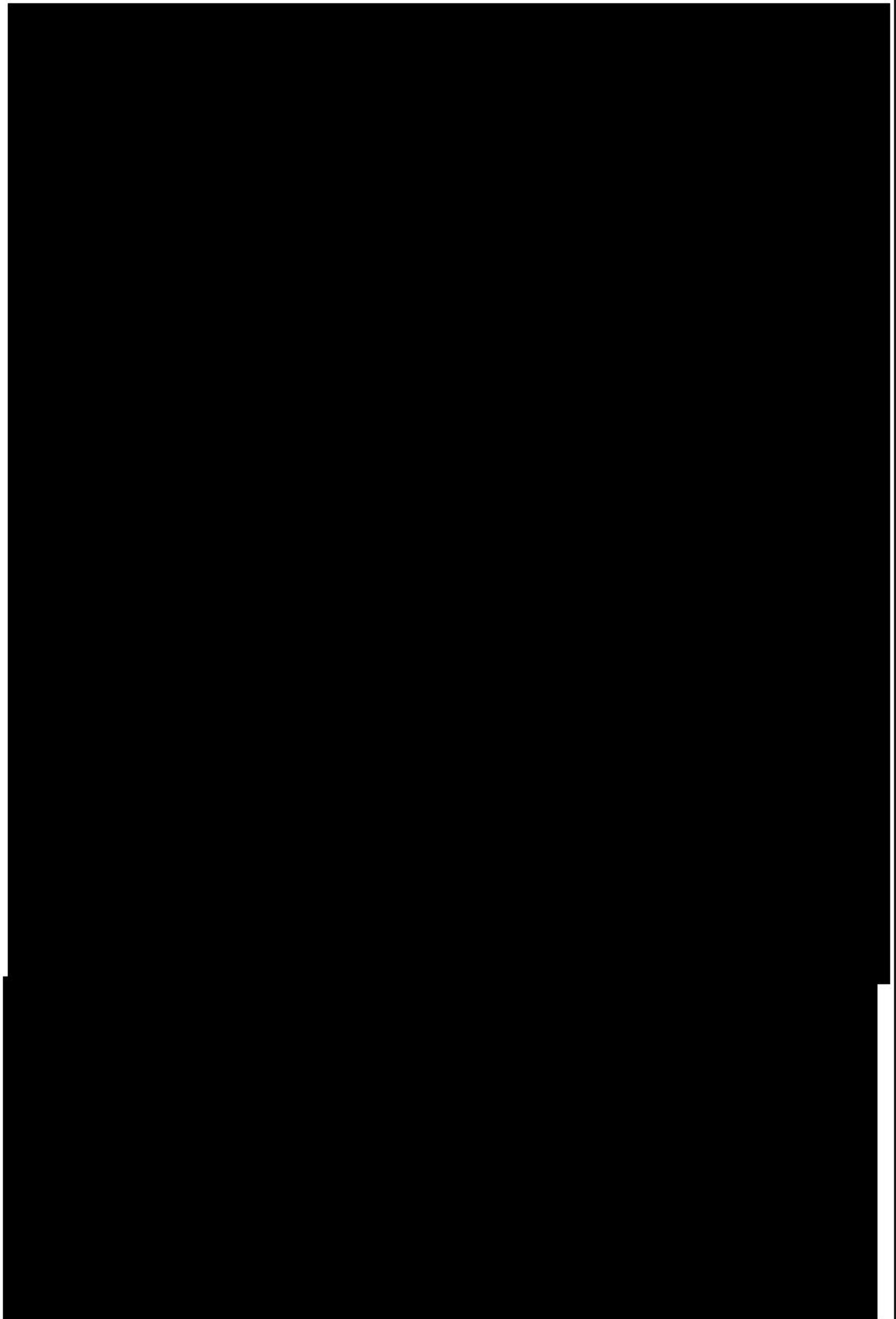
A. Right.

[REDACTED]

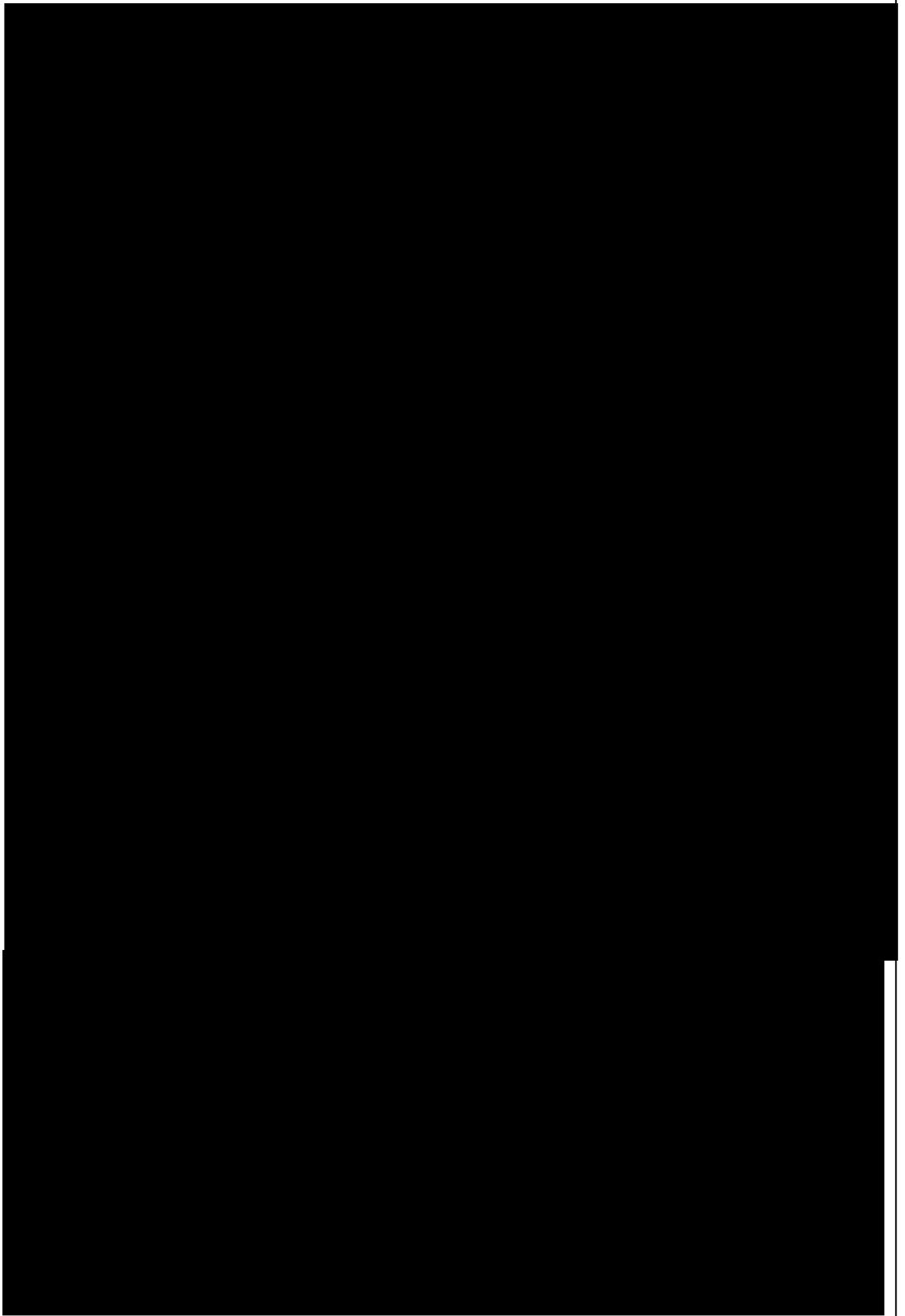
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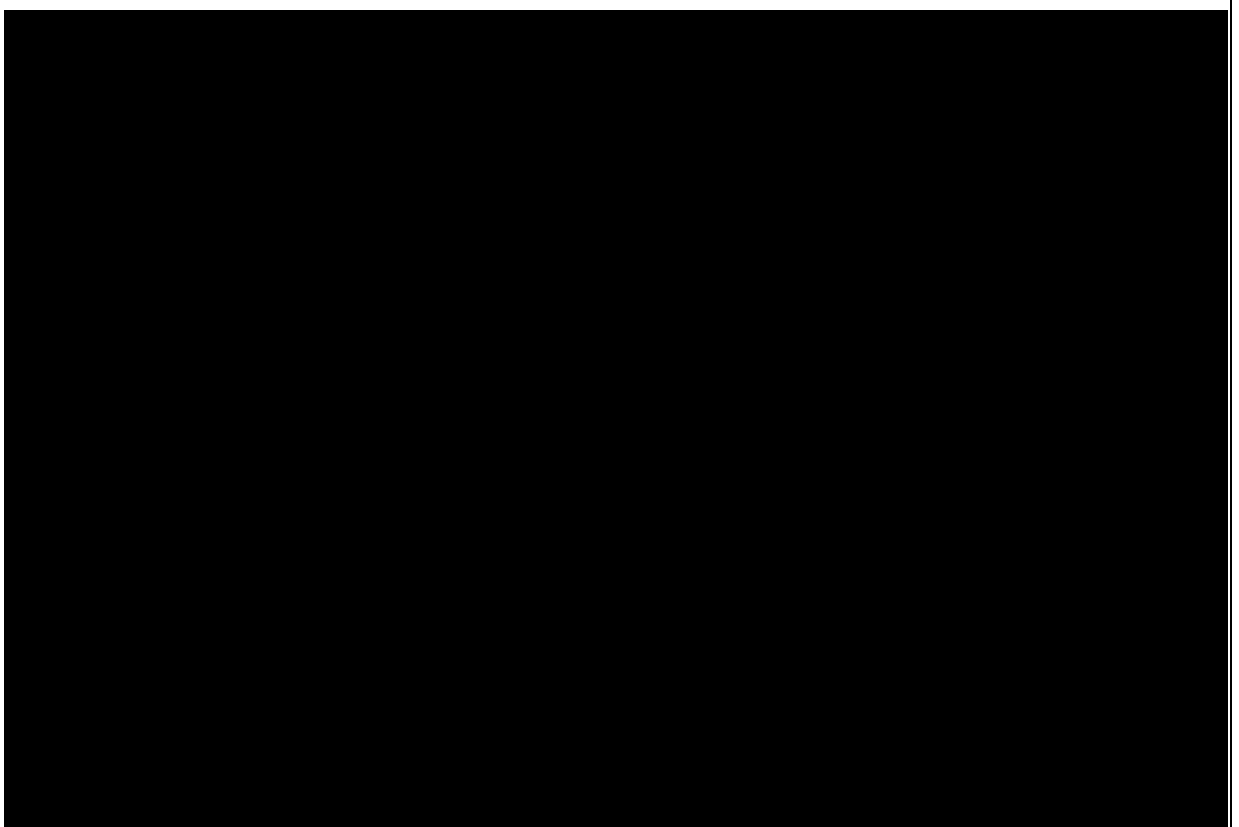
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Q. I'm going to move to March 9th. So you were in a budget hearing meeting that day; is that correct?

A. Right.

Q. And that's March 9th, 2023.

A. My cat's here. Is this okay? I'm sorry.

Q. And would it be fair to say that you were live streaming the meeting on your Facebook?

A. Yes.

Q. What happened at that meeting with respect to Sheriff Monroe?

A. I was live streaming the entire meeting. I started -- at some juncture I started talking about ways -- I started talking about ways that his department

1 could save money because he was over budget and
2 providing crappy service for medical in the jail, so I
3 made -- substandard, I should say, so I made a
4 suggestion that they -- that I found another community
5 did, and I believe my suggestion related to having a
6 full-time nurse or nurse practitioner, a registered
7 nurse or someone there all the time.

8 So I made a suggestion that I found, and whenever
9 I said that Mauro signaled him to come or told him,
10 maybe even said, you know, you want to talk about that,
11 and so he came up because I was -- after I was talking
12 about things that related to the medical treatment of
13 people, you know, improving that and him improving his
14 budget, I was criticizing him, and once I began to
15 criticize him, he came up and was told to give his
16 explanation by Mauro.

17 And he went straight for my phone that was on a
18 base, grabbed it and threw it down on the table, and it
19 was scary. That day in particular I was afraid. I
20 thought he had a gun and there was no surveillance
21 video. It was terrifying.

22 Q. Just so I'm clear, did any portion of your body
23 come into contact with Sheriff Monroe's body?

24 A. No.

1 Q. Was your phone damaged in any way?

2 A. No.

3 Q. Do you still have the same phone today?

4 A. Yes. It was on a base. I was holding the bottom
5 of the base. When he tried to take it I grabbed the
6 base. So it was like a tugging of it while I was
7 holding it. Would you like to see it? Have you ever
8 seen it?

9 Q. I have.

10 A. Okay, because I have one here at my house too.

11 Q. How far were you from Sheriff Monroe at the time
12 that he came into contact with the phone?

13 A. Pardon?

14 Q. How far away were you?

15 A. I was sitting down at the same place the whole
16 time. There's the commissioners and the clerk at the
17 end. So when he came up, I mean, I was sitting, and he
18 was in front of me and it was like an arm length, I'm
19 assuming, because that's where my phone was.

20 Q. Did you move the position of the phone at any
21 point in time as Sheriff Monroe approached the area
22 where the incident occurred?

23 A. I swiveled it toward his direction, just as
24 whenever the auditor was talking I swiveled it toward

1 the auditor because I was live streaming and I wanted
2 the public to see who was talking so whoever was talking
3 I would swivel the phone toward but didn't touch the
4 phone, just touched the base.

5 Q. How far was the phone from Sheriff Monroe at the
6 time that you moved it to view him on camera?

7 A. He was already way in the back of the room
8 sitting in a chair, and I had already turned it. So I
9 didn't touch it at all. Once he was already walking
10 toward it, it was already turned. I didn't touch it
11 after that point. You can watch it. The video is live,
12 and it was unedited because Facebook doesn't allow that
13 so, I mean, it's been the same video.

14 Q. How much time elapsed between when Sheriff Monroe
15 came into contact with either the phone or the phone
16 stand and when you got it back and were rerecording?

17 A. Well, you mean after he threw it on the table?

18 Q. No, I mean how much time elapsed between when --
19 and you know there's a dispute about what happened at
20 the time the phone was touched, right, but I'll use the
21 words to the effect of at the time that Sheriff Monroe
22 came in contact with the phone or the phone stand how
23 much time elapsed between when that occurred and when
24 you went back to recording as you normally do?

1 A. I didn't -- I didn't -- that's an incorrect
2 question. I can't answer that.

3 Q. Do you know how much time elapsed?

4 A. I can't answer. I can't answer that.

5 Q. Well, I guess, you know, if you can't answer it,
6 you can't answer it, Commissioner Frenchko, but from my
7 perspective having viewed the video I will represent to
8 you that it looked like it happened in a split second
9 and then you corrected the phone, do you dispute that?

10 A. You said corrected the phone? Before you said
11 re-record it. I didn't touch record at all.

12 Q. Live stream, I apologize, live streamed the
13 phone?

14 A. I didn't touch that portion of it because it was
15 going the whole time. Even when he threw it on the
16 table, it was still going.

17 Q. And I may be unartful with my question, but how
18 much time elapsed between when Sheriff Monroe came into
19 contact with the phone stand, whatever, how much time
20 elapsed between that and when you were able to regain
21 control of the phone?

22 A. When I put it back into the case?

23 Q. Yeah, how much time?

24 A. I don't know, seconds.

1 Q. Can you tell me how that event impacted you?

2 A. That was terrible. I thought he had a gun with
3 him. I thought -- I knew the guy -- I believed that the
4 guy is a psychopath. I'm afraid of him. He was
5 reaching for his pocket. He was coming up behind me. I
6 was so afraid that day when he was in that room. I was
7 like, oh, my God, there's no surveillance video, there's
8 just me in a room of a building where it's difficult to
9 get to because it's the upstairs of a former bank
10 building, and we've got this extremely emotionally
11 volatile psychopath of a sheriff coming at me reaching
12 for his pocket probably armed. I was afraid.

13 Q. Is it fair to say that you don't know whether he
14 was armed or not that day?

15 A. No, I'm assuming he was.

16 Q. But is it fair to say you don't know?

17 A. He doesn't go anywhere unarmed.

18 Q. And I'm asking a different question. Did you
19 observe any firearm on Sheriff Monroe on March 9th,
20 2023?

21 A. I saw him reaching to something in his pocket,
22 something, and there was something there. I don't know
23 what it was. To me it looked like there was a gun, and
24 I was afraid.

1 Q. Just so I'm clear, did you observe any firearm on
2 Sheriff Monroe on March 9th, 2023?

3 A. I observed something in his pocket. There was --
4 it looked like there was something there, but I don't
5 know whether -- I don't know for sure that it was a gun.

6 Q. Did Sheriff Monroe brandish the gun in any way on
7 March 9th, 2023?

8 A. I don't know. I felt like he was trying to
9 intimidate me by reaching for something in his pocket
10 and walking behind me like he was going to do something.
11 It was scary.

12 Q. Did you stay there and complete the meeting?

13 A. No.

14 Q. What did you do?

15 A. The meeting was adjourned immediately.

16 Q. What did you do?

17 A. I stayed there until -- for a while until he was
18 completely gone.

19 Q. You indicated earlier you believe that Sheriff
20 Monroe is a psychopath. I'd like you to describe to me
21 exactly what a psychopath is in your view.

22 A. A person who operates -- a psychopath would be
23 like a cluster B personality disorder. He definitely
24 demonstrates sociopathy. They lie. They lie. They do

1 everything to serve themselves. They're extremely
2 dangerous.

3 Q. And just so I'm clear, have you ever heard anyone
4 convey to you that Sheriff Monroe has used a firearm
5 inappropriately at any point in time before or after
6 March 9th, 2023?

7 A. No, I've heard -- but I have heard a lot of
8 stories about when he was -- I've heard about him when
9 he was a chief in Howland and a lot of his previous --

10 Q. I asked a very specific question. That's a
11 different one, right. And so you shared with me that a
12 person who lies, that that might fit the profile for a
13 sociopath?

14 A. Yeah, and they don't believe in rules. They
15 believe that rules don't apply to them. They believe
16 that they're above the law. I've already experienced
17 those things with him when I first started working
18 there. He made some agreements that were illegal that
19 were not compliant with law, and he just didn't care, he
20 just doesn't care.

21 Well, it was a gentleman's agreement. You're an
22 elected official. We don't do handshake deals for real
23 estate. Who gave you the permission to build what you
24 built on our fairgrounds? And he said, Well, someone

1 told me that I could. I said where is it in writing,
2 Sheriff? He does whatever he wants without regard to
3 law, rule, order. He hides things, sneaks things. I
4 mean, he demonstrates in my opinion --

5 Q. Is it fair to say that you dislike Sheriff
6 Monroe?

7 A. You know what, that's fair to say, but at first I
8 did like him, and I tried, I worked with him and I
9 talked with him, and then I saw his character emerge
10 where -- and it started to deteriorate, especially after
11 that occasion where I said, well, we need to have a
12 public meeting to clear this up, what you guys did,
13 because you created a bad situation.

14 Then he didn't want to have a public meeting. He
15 canceled it. He had a private meeting with Commissioner
16 Fuda so I saw that he didn't want to publicly admit what
17 had happened, and I was like, man, he's shady, you know,
18 so I learned more and more over the course of my
19 dealings with him what his character was.

20 Q. Just so I'm clear, does any licensure you hold
21 provide you with the ability to formally diagnose
22 somebody with being a sociopath?

23 A. No. No, I'm an LSW not an LISW. I'm a licensed
24 social worker with I can't remember how many years of

1 education and continuing education and I worked with
2 mentally ill people. But, no, I'm not an LISW. An LISW
3 would be the one that allows you to diagnose.

4 Q. And earlier in your deposition, I am not going to
5 rehash what you testified to last time, but there was
6 testimony regarding you reading a letter into the record
7 at a commissioners' meeting regarding conditions at the
8 jail and medical care provided; is that fair?

9 A. Yes.

10 Q. And did you dislike Sheriff Monroe at the time
11 you read that letter into the record?

12 A. Did I dislike him?

13 Q. Yeah. At some point it went from you were open
14 to him but you didn't dislike him, and I'm curious
15 whether you disliked him at the time you read that
16 letter?

17 A. Well, yeah, I mean, there were people who were
18 being mistreated in the jail, and I'm a person who
19 believes that people should be treated humanely.

20 Q. Do you believe people should be treated with
21 respect?

22 A. Yes.

23 Q. Do you believe it's respectful to place a cell
24 phone right in somebody's face as they're trying to

1 carry out their job duties?

2 A. I never placed a cell phone in someone's -- what
3 are you talking about?

4 Q. I just asked you a question. I asked you a yes
5 or no question. Do you believe that it is appropriate?

6 A. In my situation in Trumbull County where people
7 say things sometimes that aren't true, I believe that
8 having -- no, I believe that it's absolutely appropriate
9 to record things, especially if they have -- people have
10 a history of being dishonest.

11 Q. Do you believe that people are entitled to their
12 personal space whether they work for the government or
13 just in their everyday lives?

14 A. Yes.

15 Q. Do you recognize any boundaries with respect to
16 being respectful to those that you work with or those
17 members of the public that you interact with through
18 your position as a commissioner in Trumbull County?

19 A. What are you talking about? I don't understand
20 what you're saying.

21 MR. DOWNEY: Read the question back, and then I
22 can ask a better one if I need to.

23 (Question read.)

24 A. What do you mean by that? I don't understand the

1 question.

2 Q. Boundaries, do you recognize that it may be
3 inappropriate to get right next to someone and attempt
4 to videotape them, for example?

5 A. I think you're conflating respect with --

6 Q. I'm just asking you a question. If you agree
7 with it, agree with it, if you don't agree with it,
8 don't agree with it, if you think you've never done
9 that, that's a different issue.

10 My question to you is rather general. Do you
11 accept that people have personal space? I think that
12 your answer to that was yes. Do you accept that people
13 could be offended if someone attempts to place a video
14 camera in close proximity to them invading their
15 personal space? That's another question, and it's a yes
16 or no. Do you agree or disagree with that?

17 MR. BETRAS: I'm going to object.

18 Go ahead and answer, Niki.

19 A. I don't quite understand your question. Are you
20 talking about at a public meeting people could get
21 offended?

22 Q. Well, just generally, Commissioner Frenchko, you
23 know, if I'm sitting with someone and I hold a phone up
24 and I put it right there, you're seeing it, and let the

1 record reflect that I'm holding a phone up, I'm placing
2 it in front of my colleague, it's approximately a foot
3 away from her, is that appropriate?

4 A. So in this photo of yourself let the record
5 reflect that your arm is extended completely out.

6 Q. My arm's back, whichever way.

7 A. So I believe that if you hold your arm completely
8 out to someone and you're within a few inches from their
9 face that that's not acceptable, but if you're recording
10 over here closer to yourself for your own purposes or
11 for your own protection then that's different, and I
12 think that that's more social -- it's not even a matter
13 of being socially acceptable. If you're in a public
14 meeting it is a law, you are allowed to record a public
15 meeting.

16 Q. We're not asking what you're allowed or not
17 allowed to do. We're asking whether or not you
18 recognize any boundaries with those people that you
19 interact with.

20 Now, so let's do it this way. How close is too
21 close when you're recording a public meeting when you're
22 interacting with either a member of the public, a
23 colleague, an employee, how close is too close?

24 MR. BETRAS: Objection.

1 Go ahead and answer, Niki.

2 A. How close is too close when you're recording?

3 Q. From a distance standpoint.

4 A. If you're -- if you're walking by someone and
5 it's the same distance as it would be if you're passing
6 by someone, if your body would be that close to them I
7 believe it's okay to have a camera that close. It's the
8 same thing as having a body camera.

9 Q. So a couple inches?

10 MR. BETRAS: Objection.

11 Go ahead and answer, Niki.

12 Q. Is it fair to say from your perspective that
13 being a couple inches away from someone it is perfectly
14 appropriate to record them with your cell phone?

15 A. A couple of inches?

16 Q. Sure. And I'm trying to paraphrase what you told
17 me. You said just walking by someone. I'm saying is a
18 couple of inches acceptable?

19 A. I don't know.

20 Q. Is there anywhere that you draw the line that
21 this is too close in recording someone, whether it be an
22 employee, a colleague, a member of the public?

23 A. I'd probably say in my opinion would be closer
24 than an arm's, like if you have your arm outstretched

1 and then you're towards them because it's kind of
2 aggressive because I've had people follow me around at
3 work with their arm outstretched and come up into my
4 face and that felt extremely uncomfortable because they
5 were -- their hand was within inches from my face and
6 their arm was completely outstretched like you just
7 described. So that I would never do. I think that
8 that's unacceptable.

9 MR. DOWNEY: Is everybody okay with just taking a
10 brief break because I've got another topic we're going
11 to start, public records? Does five minutes make sense?
12 Are you cool with that, David?

13 MR. BETRAS: I'm good with that.

14 MR. DOWNEY: Let's do five. We'll come back at
15 12:40 if that makes sense. I've got some questions
16 about public records. Then we'll turn it over to
17 Andrew.

18 MR. YOSOWITZ: Can Wix and Ross come back when we
19 come back?

20 MR. DOWNEY: I don't have any additional health
21 questions, yes.

22 (Recess taken.)

23 (Sergeant Ross and Sergeant Wix join the ZOOM
24 deposition.)

1 MR. DOWNEY: Back on the record.

2 Q. (By Mr. Downey) Commissioner Frenchko, would you
3 please describe the Trumbull County public records
4 retention policies.

5 A. I don't have them with me so I really can't
6 describe them. The records retention policy identifies
7 all of the items that are public records, how long they
8 need to be retained and what the process is -- oh, my
9 God, I don't want to say something that's incorrect
10 because I don't have it in front of me, but in general
11 it identifies everything that's a public record and how
12 long it needs to be retained and when they can be
13 destroyed under certain -- and under certain
14 circumstances, but that is not a conclusive -- I'm
15 sorry, that is not an exhaustive answer.

16 Q. So let me ask you this. Are there any changes
17 you would make to the record retention policies in
18 Trumbull County, Ohio?

19 A. I don't know without looking at it.

20 Q. Have you tried to make any changes to the record
21 retention policies in Trumbull County, Ohio, prior to
22 today?

23 A. I don't remember.

24 MR. BETRAS: Objection.

1 Go ahead and answer.

2 A. I don't remember.

3 Q. Do you think public records are properly
4 maintained in Trumbull County?

5 A. No.

6 Q. Why not?

7 A. The glaringly obvious problem is that text
8 messages are public records, and there's not even
9 training for employees or any method used to store
10 records.

11 I believe that we need to have more structure
12 relative to the processes to ensure that county
13 employees and elected officials retain things as they
14 should.

15 Q. When did you first come to this conclusion that
16 there were issues with records being retained properly?

17 A. Before I was elected.

18 Q. And just so I'm clear, have you yourself
19 introduced anything to modify, change, revise the
20 current public policy?

21 A. That's not my -- that's not in my purview.

22 Q. So the answer would be no?

23 A. Well, okay, so I have made recommendations in our
24 office that -- and the things that I can control, I've

1 actually caused agenda items to be voted on so that our
2 employees would change our office policy. It is a
3 public records request policy. There's a custodian, and
4 none of that was clearly defined. And the state auditor
5 has been fining a lot of communities because they're not
6 updating that, and I wanted to bring us into better
7 compliance related to that so I have made some efforts
8 to change what I could in our office.

9 I could only lead horses to water, but I can't
10 make them drink. For example, my board at the time,
11 Frank and Mauro, had not even to my knowledge taken the
12 required public records -- or, I'm sorry, the sunshine
13 law training which includes records.

14 Q. Do you mind if I -- I do want to get through some
15 of this, and I appreciate your answer, but specifically
16 with respect to you, have you at any point since you
17 assumed your duties as Trumbull County commissioner
18 attempted to address the public records retention policy
19 with the Trumbull County prosecutor's office?

20 A. That's not the correct avenue.

21 Q. I'm asking you did you do that with that office?
22 If the answer is yes, it's yes; if it's no, it's no,
23 then I'll ask you to explain.

24 So first question, have you ever contacted the

1 Trumbull County prosecutor's office regarding the public
2 records retention policy in place for Trumbull County,
3 Ohio?

4 A. No.

5 Q. Have you taken steps to contact any public agency
6 that you believe public records are within their purview
7 to modify, revise, or change the public records
8 retention policy in Trumbull County, Ohio?

9 A. No, that's done with -- the records commission is
10 over that.

11 Q. I'm just asking because you testified it's
12 something you were thinking about before you ran, and
13 I'm asking you what you've done. Now we're going to
14 move on.

15 A. Yeah, well, it's the staff, and in our office
16 specifically the only thing we can control ostensibly
17 would be the staff.

18 Q. There's not really a question outstanding right
19 now.

20 A. I'm sorry.

21 Q. How many records requests have you made as a
22 commissioner to fellow commissioners?

23 A. I don't remember.

24 Q. Is it fair that you've made several?

1 A. I don't remember. I don't know that it was many.

2 I don't remember.

3 Q. More than one?

4 A. Yes.

5 Q. How many records requests have you made to any
6 person associated with Trumbull County, Ohio?

7 A. I don't know.

8 Q. How many public records requests have you
9 received as a commissioner?

10 A. I don't remember.

11 Q. Have you received public records requests as a
12 commissioner?

13 A. Yes.

14 Q. When have you most recently received a public
15 records request as commissioner?

16 A. Maybe within the last, approximately within the
17 last month or so, a few months.

18 Q. Do you fulfill your own records requests?

19 A. No, according to our --

20 Q. If not, who does?

21 A. According to policy and law the custodian of
22 records is responsible for fulfilling requests.

23 Q. And who has been the custodian of records to the
24 extent that it's been unchanged since July 7th, 2022?

1 A. The clerk.

2 Q. Do you recall receiving a public records request
3 from Mauro Cantalamessa for employee complaints during
4 the January 19th, 2023, commissioners' meeting?

5 MR. BETRAS: I'm going to object.

6 Go ahead and answer, Niki.

7 A. I don't remember.

8 Q. Do you recall fulfilling that request?

9 A. If that was -- no, no, that would be -- if it
10 were even given to -- if a request is given to me it's
11 to be given to or given back or taken back by the
12 custodian who was the clerk. So the clerk would have
13 been responsible for documenting that as a verbal
14 request and then logging it and fulfilling it.

15 I have made efforts to develop an internal
16 practice, but that hasn't come to fruition because the
17 other two stop anything that I try to do to improve
18 processes.

19 Q. So here's another question. It's a different
20 one. Did you receive a public records request for your
21 phone records, and if so, did you fulfill it?

22 MR. BETRAS: Objection.

23 Go ahead and answer, Niki.

24 A. I don't recall. I know that there was -- I

1 recall some records requests coming in for phone
2 records, but what is supposed to happen is the custodian
3 of record is supposed to identify whether it is
4 overbroad or actually they're supposed to make sure that
5 it's clear what they're asking for, first, is it a
6 public record, secondly, is it --

7 Q. Commissioner Frenchko, not to cut you off, I
8 understand what the public records requirements are.

9 A. I just want to tell you I've had people ask for
10 personal conversations with people, and those are not
11 public records.

12 Q. Did you ever provide the clerk or the public
13 records custodian in Trumbull County, Ohio, access to
14 your phone based upon a public records request?

15 A. Did you say would I?

16 Q. No, did you.

17 A. No one has asked me. No one has done the steps
18 in our office. The people who work there do not do what
19 they're supposed to do, and I can't cause them to. I
20 have numerous emails of me saying, hey, I need you to
21 follow up with these records requests.

22 Q. I understand. So do you believe that your cell
23 phone that may be used for personal use and may also be
24 used for professional use, that the documents contained

1 therein are subject to public records requests?

2 A. Correct. They are.

3 Q. Have you ever provided any content from your cell
4 phone in response to a public records request since
5 you've been a commissioner in Trumbull County, Ohio?

6 A. That is the job of the custodian to fill.

7 Q. I'm asking you have you ever provided any records
8 from your cell phone in response to a request for public
9 records during the time you have been a Trumbull County
10 commissioner?

11 A. I don't remember.

12 Q. Have you ever provided your cell phone to either
13 the records clerk or someone else identified with the
14 responsibility to respond to public records requests on
15 behalf of Trumbull County at any point in time since
16 you've been a commissioner?

17 A. No one has asked for that.

18 Q. So the answer would be no?

19 A. They don't work for me. The bottom line is is
20 they should be working with me, but they don't work with
21 me.

22 Q. It's a --

23 A. The clerk does not work with me.

24 Q. I understand your response, but the answer to the

1 question, if I'm correct, is, no, you have not provided
2 your phone to anybody?

3 A. No one has asked for it.

4 Q. That's a different question whether somebody's
5 asked for it.

6 A. I see what you're doing here, and it's cute.

7 Q. Well, I'm a lawyer, and I'm asking you questions,
8 and I'd like you to answer the ones I ask because the
9 record is preserved, and a lot of the questions I've
10 asked you have not answered them, and it's in the
11 record. So as I ask them I would appreciate if you
12 would answer the specific question that I'm asking you.

13 Do you recall Ms. Hartman confronting you
14 regarding your failure to respond to her public records
15 request for complaints you allegedly received regarding
16 the Trumbull County jail during the August 3th, 2022,
17 commissioners' meeting?

18 MR. BETRAS: Objection.

19 Go ahead and answer, Niki.

20 A. Ms. Hartman?

21 Q. Correct.

22 A. I remember -- no, I don't remember exactly what
23 her statement said, but she -- I don't remember what it
24 said so I can't answer that.

1 Q. Did you act in any way -- following learning of
2 Ms. Hartman's concerns did you act in any way to fulfill
3 or address her concerns?

4 A. I spoke to the clerk about fulfilling the records
5 so that is what I did. I went to the appropriate chain
6 pursuant to our county policy, which is the clerk, and
7 she would not -- I don't know what happened after that.

8 Q. Can you please state the clerk's name for the
9 record.

10 A. Paula Vivoda-Klotz.

11 Q. And when did you go to Ms. Klotz regarding this
12 issue raised by Ms. Hartman?

13 A. I don't remember.

14 Q. Was it in close proximity to learning of
15 Ms. Hartman's concerns?

16 A. Yes.

17 Q. Did you follow up to see if those concerns had
18 been addressed?

19 A. Again, the --

20 Q. Is that a no?

21 A. Yes, I did, and she ignored me just as she did
22 with --

23 Q. How many times did you interact with
24 Ms. Vivoda-Klotz regarding Ms. Hartman's concerns?

1 A. I can't remember the number. I can't remember.
2 I know that I've talked to -- and right now I'm still
3 trying to get the current clerk to go back and do what
4 she was supposed to do, and she won't do what she's
5 supposed to do either.

6 Q. And in your office right now who determines if a
7 record is a public record?

8 A. Right now there is an attorney named Brodie, I
9 don't remember his full name, and he is the person who
10 is to be helping the staff to do that.

11 And I as a commissioner who has training and has
12 read the sunshine law and the Yellow Pages on a regular
13 basis have said to my staff repeatedly this needs to be
14 more specific, this is overbroad, you need to respond to
15 them with X, Y or Z, and they don't to it. I am not the
16 person responsible to communicate and log our responses
17 to the public, but I --

18 Q. That's not the question I asked.

19 A. -- try to cause them to do it.

20 Q. That is not the question I asked, Commissioner
21 Frenchko. I didn't ask that. I asked who determines
22 what is a public record in the Trumbull County
23 commissioners' office, and you mentioned somebody named
24 Brodie.

1 Is there an employee at the Trumbull County
2 commissioners' office who determines what is a public
3 record?

4 A. The commissioners ultimately should be able to
5 decide what is or isn't a public record because we have
6 the training.

7 Q. That's not what I'm asking you, Commissioner.

8 A. Okay.

9 Q. I'm asking is there an employee of the Trumbull
10 County commissioners' office that is designated to
11 determine what is or is not a public record?

12 A. That would be the custodian I would believe and
13 then the commissioners themselves in communication with
14 them because we have done the training. I've had --

15 Q. Who is the custodian?

16 A. I've had Frank Fuda request transcripts.

17 Q. Who is the custodian?

18 A. It was Paula Klotz.

19 Q. Okay. Who is it now?

20 A. Lisa Blair. Would you -- are you conflicted,
21 sir, because I know you represent against her, but it
22 sounds like --

23 MR. BETRAS: Niki, just answer his questions.

24 Q. So when did Mr. Brodie become an assistant with

1 addressing that?

2 A. I can't remember.

3 Q. And is Mr. Brodie with the prosecutor's office?

4 A. He's outside counsel.

5 Q. And was he retained specifically to address
6 public records issues?

7 A. Yes, because our prosecutor's office does not
8 specialize in making proper responses so we had to get
9 someone outside.

10 Q. So who determines if a public record does not
11 need to be retained any longer?

12 A. The records commission.

13 Q. And who is on the record commission?

14 A. I do not know.

15 Q. Does the board of county commissioners have any
16 oversight responsibility over the records commission?

17 A. No.

18 Q. Is it a separate entity?

19 A. Yes.

20 Q. Have you ever yourself in your position as a
21 Trumbull County commissioner interacted with the records
22 commission?

23 A. No.

24 Q. Your complaint alleges the destruction of public

1 records. What records do you believe were destroyed?

2 A. Text messages and surveillance video, they were
3 destroyed per your clients' depositions.

4 Q. What surveillance video do you believe was
5 destroyed?

6 A. All evidence of the conspiracy related to my
7 arrest via text message and surveillance video in the
8 commissioners' administration building and in the
9 sheriff's administration building has been destroyed.

10 Q. And what specific cameras were recording where
11 the videos have not been preserved?

12 A. I don't remember exactly what was requested, but
13 the surveillance videos in probably I think it was a
14 week or two weeks leading up to the arrest in the
15 administration building, which would have been the fifth
16 floor where the commissioners are and in the sheriff's
17 area as well, where his administration offices are,
18 because typically as they admit or as Paul Monroe
19 admitted they don't text those things, they pick up the
20 phone, they call, and they have meetings.

21 So I think it would prove to show some
22 circumstantial evidence to see them collected and
23 gathered in certain offices; however, all of those
24 videos, I believe, have been destroyed along with the

1 text messages which are also evidence.

2 Q. When did you make a public records request for
3 the evidence that you believe has been destroyed?

4 A. I can't recall. I know it was shortly after my
5 arrest.

6 Q. What form was your request?

7 A. I believe email, I believe verbal as well.

8 Q. To whom?

9 A. I can't recall specifically, but there are people
10 that I reached out to in data.

11 Q. To whom were those requests lodged, either verbal
12 or written?

13 A. I can't remember specifically. I can't remember
14 specifically.

15 Q. Do you recall sending an email to Sheriff Monroe
16 asking for jail medical policies at some point?

17 A. Yes.

18 Q. And did you receive the jail medical policies?

19 A. I did.

20 Q. We're going to show you -- what's the exhibit?

21 MS. SUDHOFF: This has been previously marked.
22 We don't have the number.

23 Q. Commissioner Frenchko, we're about to go to a
24 letter from your attorney, and I think it's been

1 previously marked in another deposition. For purposes
2 of today we're going to say it's Defendant's Exhibit 1
3 to your deposition, but we'll go ahead and coordinate
4 with counsel so that we have one exhibit once this thing
5 gets filed with the court some day.

6 Are you able to see that document?

7 A. Yeah. I want a minute to read it.

8 Q. Sure.

9 MR. YOSOWITZ: While she's reading, I have it
10 previously marked as Exhibit No. 8.

11 MR. DOWNEY: We're going to call it Exhibit 8.

12 THE WITNESS: I'm not going to read it until you
13 guys are done talking because my brain can't do that,
14 I'm sorry.

15 MR. DOWNEY: Go ahead and read it.

16 A. Yes.

17 Q. Is this document Exhibit 8 a public records
18 request that you made through your counsel?

19 A. No, I don't believe so. This is a preservation.

20 Q. Did you receive this letter?

21 A. Yes, preservation, for a preservation or a
22 litigation hold or preservation hold, I don't know, I'm
23 not an attorney, is different than a public records
24 request.

1 Q. Okay. Have you made --

2 THE WITNESS: Can we wait until David's in the
3 room?

4 MR. BETRAS: I'm here. Niki, I'm right here.
5 I'm just going up to the screen so I can see it. I'm
6 right here.

7 MR. DOWNEY: All I have is Commissioner Frenchko
8 on the screen right now so that's what I'm looking at.

9 MR. BETRAS: I'm here. I just couldn't see it.
10 I had to go up to it to see it, that's all.

11 THE WITNESS: Okay. I'm sorry.

12 Q. (By Mr. Downey) Were any other public records
13 requests made by you which are included in any
14 allegations in your lawsuit?

15 A. Yes.

16 Q. Tell me about them. If they're included in your
17 lawsuit, this is my chance to ask you about them,
18 Commissioner, so tell me about them.

19 A. My records request related to video surveillance,
20 it was basically the same things that we did in
21 discovery because I actually wrote it and sent it over
22 to David to file so everything that was originally
23 requested.

24 MR. BETRAS: Hold on, hold on, Niki, I don't want

1 you telling them any discussions that we had. They're
2 not allowed to ask you about any discussions or letters
3 between us so do not tell them anything like that.

4 MR. DOWNEY: For the record, I did not ask for
5 anything that you talked to Mr. Betras --

6 MR. BETRAS: I just want, Niki, to say any
7 information, Niki, or any discussions you and I have,
8 that's attorney/client privilege.

9 THE WITNESS: I understand. I just want him
10 to -- he's asking me to describe something that he
11 already has so I'm just trying to help him out. Sorry.

12 Q. (By Mr. Downey) If you would answer the question
13 and please don't refer to any private communications
14 with your counsel.

15 A. Do you want me to take a moment to look up
16 something and then read it to you or did you?

17 Q. Not particularly, no, I just want to know what
18 you know right now.

19 A. Okay. So I requested text messages, memos,
20 emails, written notes, surveillance video from within
21 the building, everything -- and it was also, I believe,
22 two weeks, for two weeks or a month or so leading up, I
23 can't remember specifically, leading up to that as well,
24 and it was among -- it was for Frank, Mauro, Paul

1 Monroe, the deputies, I believe I included Jim Osaki. I
2 can't remember specifically, but there were people that
3 were included, oh, and all of the staff as well that
4 were in the commissioners' -- the commissioners and
5 their staff, I believe.

6 Like I said, I don't want to say. I could just
7 tell you I don't remember because I don't remember
8 specifically, but I'm trying my best here so please
9 realize that it's non-exhaustive and might not be
10 exactly perfect.

11 Q. Did you ever receive a notice of preservation
12 letter in regards to the allegations contained in your
13 lawsuit in your position as commissioner at Trumbull
14 County?

15 A. I don't remember.

16 Q. Do you have any personal knowledge of whether
17 Mauro Cantalamessa received that letter?

18 A. Yes.

19 Q. And what's the basis of your personal knowledge
20 on that?

21 MR. BETRAS: Do we need to have the letter still
22 up or can we take it down? There. Thank you.

23 MR. DOWNEY: Great minds, David.

24 A. Was your question about that specific letter or

1 anything else?

2 Q. No, anything else.

3 A. Yes.

4 Q. How do you know?

5 A. Because our prosecutor's office was involved.

6 Q. Do you have any personal knowledge whether Frank
7 Fuda received any letter regarding preservation of
8 evidence?

9 A. Yes.

10 Q. And what's the basis of that knowledge?

11 A. Because our prosecutor's office was involved and
12 the -- everything was sent, everything from my
13 attorney -- look, everything from my attorney was sent.
14 They asked me for the address.

15 Q. I'm just asking you what did you do in your
16 position as a commissioner in response to that letter?

17 A. To talk to the -- wait, I'm confused, I'm sorry.

18 Q. Did you yourself take any steps to preserve
19 evidence?

20 MR. BETRAS: I'm going to object to that, Niki,
21 but go ahead and answer.

22 A. I really don't understand. I don't even know
23 that I received a notice for myself. I wasn't the one
24 being sued.

1 Q. You're a commissioner in Trumbull County, Ohio,
2 correct?

3 A. Yes.

4 Q. And if a letter was sent to Trumbull County
5 regarding the preservation of evidence, do you not agree
6 that you would have a role in preserving that evidence?

7 A. Yes, preserve, I keep everything, yeah.

8 Q. So what steps did you take upon receipt of that
9 correspondence?

10 A. Not deleting one damn thing.

11 Q. All right. Are you familiar with things being
12 over-read or documents being automatically deleted, are
13 you familiar with that happening at any point in time in
14 your life?

15 A. What did you say?

16 Q. I'll give you an example. You know, some places
17 a video will override after seven days or 14 days or 21,
18 whatever the time frame is, and I know I asked you
19 earlier about your records retention policy, you didn't
20 have specific knowledge about it when we discussed it
21 today, but what I'm asking is are you familiar with that
22 occurring, that if the videos could be overridden or
23 overtaped, that documents could be automatically deleted
24 in the form of emails, are you familiar with that

1 potential happening?

2 A. With the videos at the county that's the only
3 thing that I'm aware of and that's so --

4 Q. My question is what did you do to preserve that
5 evidence?

6 A. I contacted -- I contacted the IT department,
7 and -- but unfortunately the IT department has created
8 something to disallow me from receiving public records
9 without the majority of the board approving them.

10 Q. Did you send any written correspondence to the IT
11 department regarding the preservation of evidence?

12 A. I can't remember if it was written or if it was
13 verbal, but I did talk to an employee there.

14 Q. To whom did you speak?

15 A. I believe it was Mark Malacky, I think.

16 Q. And when did this conversation take place?

17 A. I can't remember.

18 Q. Have you ever asked --

19 A. I call him often.

20 Q. I'm sorry, Commissioner, I had another question,
21 okay?

22 A. Okay.

23 Q. Have you ever asked someone to be removed from
24 the hearing room?

1 A. I don't believe I've asked anyone to be removed
2 from the hearing room during a public meeting. After
3 the meeting had closed and was over I have asked for
4 that because there's no longer --

5 Q. I'm asking specifically the hearing room, so if
6 you would just tell me when and who you've asked to have
7 removed from the hearing room.

8 A. After the meeting there was a man who -- there
9 were a group of people who want me removed from office
10 and they stalk me, and he's a member of that group.

11 And after a particular meeting and after him
12 following me and taking pictures of me at dinner with my
13 family and that type of thing, he came up to me and
14 asked me where I was that weekend and where I was out
15 and specifics about my whereabouts, and I -- he came to
16 me, and I did ask, I think that there was a deputy, it
17 was a woman who no longer works for the sheriff, and she
18 actually told him to leave because he was quite
19 intimidating.

20 Q. And what was the name of this gentleman?

21 A. Kelly Glenn.

22 Q. And did you press the panic alarm regarding
23 Mr. Glenn?

24 A. I can't remember, but -- no, on that particular

1 time that I'm talking about I went to the back of the
2 room to pick up a piece of paper, and he stayed in there
3 and came very close to me and was asking me personal
4 questions. And he follows me around in the community
5 too so it's eerie.

6 Q. Was this on May 18th, 2022?

7 A. I don't know. I think it was before that. No.

8 Q. Did you ever press the panic alarm?

9 A. I have before, but the situation I'm describing
10 was in 2021 because I believe that Richard Jackson was
11 still the HR director at the time.

12 He has -- this group of people have a
13 longstanding history of doing this so this was I believe
14 in 2021 because the employee that --

15 Q. I'm going to go on to the next question. I
16 appreciate the timing may not be fresh right now. What
17 happens when you press the panic alarm?

18 A. I believe that it alerts the deputies to come up
19 and see what's going on.

20 Q. And did you ask the deputy to remove Mr. Glenn?

21 A. I don't remember that particular -- I don't
22 remember, but I do remember a time that the woman deputy
23 was there, heard how he was talking to me and removed
24 him, that was the year I believe that was 2021, though.

1 Q. Did you ask to have him removed?

2 A. I think I did.

3 Q. What authority do you have to ask to have a
4 citizen removed from the hearing room?

5 A. The meeting was over. There was no public
6 business. The hours for using a hearing room, it's just
7 like a courtroom, when you go into the courtroom the
8 people who are there are there for a particular hearing
9 or a case or a trial or for the events of the day. Once
10 those events of the day are over, it is time for them to
11 exit. They do not have the privilege of -- people don't
12 have the liberty of staying and cornering me or hovering
13 over me and asking me, you know, my whereabouts or
14 personal things.

15 The time for anything that relates to public
16 discourse is during the public meeting, not after it's
17 over while I'm gathering papers off of a table or
18 sitting at my personal workspace, which is similar to
19 what a judge would sit at, at an elevated area.

20 Q. Just so I'm clear, Commissioner, it would be
21 appropriate to ask a citizen to be removed from a
22 hearing room regardless of their reason for being there
23 as soon as the actual meeting is over; is that correct?

24 A. After for sure. If you come to a meeting --

1 Q. It's a yes or no. It's a yes or no.

2 A. I have the right to give --

3 Q. It's a yes or no. I've heard you go on and on
4 today.

5 MR. BETRAS: She has a right to answer the
6 question.

7 A. I have a right to give a full and complete
8 answer.

9 Q. It's a yes or no question. Yes or no?

10 A. I have the right to give a full --

11 Q. Commissioner Frenchko, I asked you a yes or no
12 question. If the hearing is complete is it your
13 testimony that it is appropriate to have a citizen
14 removed from a hearing room because the hearing is
15 complete?

16 MR. BETRAS: Objection.

17 Go ahead and answer, Niki.

18 A. Citizens don't even have the ability to come into
19 our fifth floor.

20 Q. You're not answering the question.

21 A. I'm doing it backwards because you've been
22 cutting me off here.

23 Q. Is it a yes or no?

24 A. I'm doing this backwards because you've been

1 cutting me off.

2 MR. DOWNEY: Let the record reflect that
3 Commissioner Frenchko is refusing yet again to answer a
4 question.

5 MR. BETRAS: Let the record reflect Commissioner
6 Frenchko is trying to answer your question.

7 MR. DOWNEY: No, David, the record is full of
8 Commissioner Frenchko not answering questions. We've
9 got about two days --

10 MR. BETRAS: Niki, the simple question is when a
11 meeting is over.

12 MR. DOWNEY: I asked a simple question. I'd like
13 to stick with the one I asked.

14 THE WITNESS: I will answer that specific
15 question as long as I can explain it afterwards.

16 MR. DOWNEY: That's not how it works.

17 THE WITNESS: I think it does.

18 Q. (By Mr. Downey) I am asking you a simple
19 question. It is your belief that when a hearing is
20 completed it is appropriate for a commissioner,
21 yourself, to have a member of the public removed from
22 the hearing room?

23 A. If there's not county business going on and
24 citizens aren't allowed in the hearing room unless

1 there's a meeting and the meeting is over --

2 Q. That's not the question.

3 A. Then the meeting is over then yes. Yes, I just
4 answered it.

5 Q. The question is a simple one.

6 A. I answered it, and you're talking over me. I
7 hope this young lady is able to hear what I said.

8 Q. I hope she's able to as well. I'm going to ask
9 it one more time. It's a yes or no. I'd appreciate it
10 if you would answer it in the way it's intended.

11 Do you believe it is appropriate and acceptable
12 for a commissioner to tell a member of the general
13 public or an officer to remove that member of the
14 general public because the hearing is complete?

15 A. When there's no county business or a meeting is
16 over, yes.

17 Q. Thank you.

18 A. And only if they're doing something that's
19 offensive as well.

20 MR. DOWNEY: There's not a question outstanding.

21 We're going to take about three minutes, and then
22 we're going to get back and I'm probably going to finish
23 up and we'll turn it over to Mr. Yosowitz.

24 (Recess taken.)

1 Q. (By Mr. Downey) Commissioner Frenchko, we're back
2 on the record. This is a general question for you. Did
3 you experience any other injuries or damages that we
4 have not discussed here today regarding the allegations
5 in your lawsuit?

6 A. I can't remember what I put on my --

7 THE WITNESS: Is this something that we should be
8 having the Sheriff's Department on for?

9 MR. BETRAS: Wait a minute. Hold on, Dan.
10 Outside of any physical or mental, anything else I think
11 he's asking you. Don't mention physical or mental.

12 Is that fair for me to clarify that, Dan? I
13 don't want to trample on you.

14 MR. DOWNEY: Yeah, this is just a catchall. I
15 want to make sure we discuss Commissioner Frenchko's --
16 the way this has impacted her.

17 Q. (By Mr. Downey) So if there's anything additional
18 that we haven't talked about, Commissioner, we can ask
19 the deputies to leave. If you feel like you've been
20 able to testify how it's affected you the answer is no,
21 we can move on to my next question.

22 A. You were asking very specific questions, and I
23 didn't elaborate much, and you tried to guide me to
24 being very narrow so now --

1 Q. I will dispute that. If you would like, we will
2 ask the deputies to leave and you can answer the
3 question and take as much time as you would like,
4 Commissioner.

5 A. Could we go back to --

6 MR. DOWNEY: We'll do that. Mr. Yosowitz, would
7 you please ask the deputies to shut off the camera and
8 we'll give Commissioner Frenchko an opportunity to
9 address her allegations.

10 (Sergeant Ross and Sergeant Wix leave the ZOOM
11 deposition.)

12 MR. DOWNEY: So they're off.

13 Q. (By Mr. Downey) So, Commissioner Frenchko, I'll
14 ask it again, did you experience any other injuries or
15 damages that we have not discussed here today?

16 A. I would ask if we can go back over and see what
17 we did discuss just to make sure I didn't miss anything.

18 Q. No, that's not how it works.

19 MR. BETRAS: That's not how it works, Niki.
20 You've got to say -- it's a catchall question. He's
21 allowed to narrow his questions. He's asking is there
22 anything else that we didn't discuss that you want to
23 tell him about.

24 A. 

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MR. BETRAS: He's not asking you for details.

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THE WITNESS: Okay.

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Also the money, like, I know I had to pay, you know, legal fees as well I want to include.

20

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Q. Commissioner Frenchko, do you have a ballpark of how much your legal fees cost?

22

23

MR. BETRAS: I'm going to object to that.

24

MR. DOWNEY: To the extent they're a component of

1 your damages, David, that's why I'm asking.

2 MR. BETRAS: I'd have to go back. I don't even
3 know. I don't know how the hell she's going to know.
4 I'd have to go back and calculate it. We'll provide
5 that to you.

6 Q. I'm just asking if it's part of your damages. It
7 doesn't have to happen today.

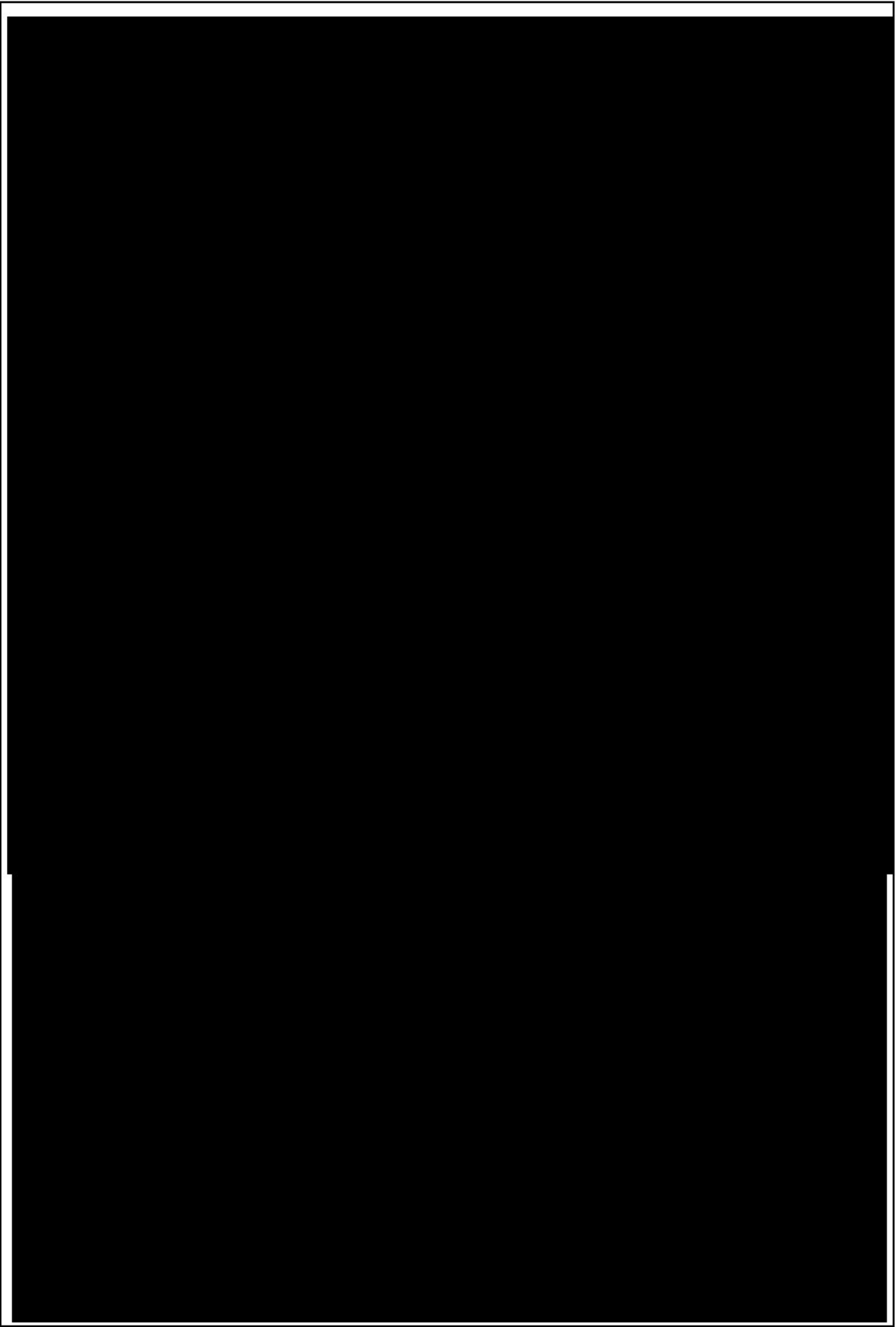
8 I do want to clarify a little bit of your answer,
9 Commissioner Frenchko. [REDACTED]

10 [REDACTED] [REDACTED]
11 [REDACTED]

12 A. [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
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1 A. There you go.

2 Q. I'd also like to get them directly from the
3 provider if there is a provider and where you went.

4 A. I won't know until you get the records then we
5 can figure it out from there.

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12 MR. BETRAS: Niki, to the extent you have that
13 please provide it to me.

14 THE WITNESS: I don't have anything. I would
15 have to do the same thing that I suggested to them was
16 contact the doctor.

17 MR. BETRAS: Do that then.

18 Q. (By Mr. Downey) So, Commissioner Frenchko, why
19 did you call Sheriff Monroe on August 16th, 2023?

20 A. I don't remember.

21 Q. How did you get his number?

22 A. I've had Sheriff Monroe's phone number for a very
23 long time, his cell phone number before.

24 Q. So just so the record's clear, you didn't contact

1 Sheriff Monroe on August 16th because you were just cold
2 dialing phone numbers that were obtained through
3 discovery in the case?

4 A. I don't remember.

5 Q. Why did you call Brian Butcher on August 16th,
6 2023?

7 A. I don't remember.

8 Q. Have you ever called him before?

9 A. I don't remember.

10 Q. How did you get his number?

11 A. I don't recall. I don't recall.

12 Q. Is there anything that would affect your ability
13 to remember or recall things that is impacting you in
14 your testimony today?

15 A. No.

16 MR. DOWNEY: I have no additional questions for
17 you right now, Commissioner Frenchko. I think that
18 Mr. Yosowitz will have a number of questions, and we may
19 need to take a minute so his clients can come back in
20 the room so that they can hear it.

21

22

23 MR. DOWNEY: We're done. You answered the
24 question. I'm done. You can talk to Mr. Yosowitz about

1 that.

2 THE WITNESS: [REDACTED]

3 MR. YOSOWITZ: Yes, please.

4 (Sergeant Ross and Sergeant Wix join the ZOOM
5 deposition.)

6 - - -

7 EXAMINATION

8 By Mr. Yosowitz:

9 Q. Commissioner Frenchko, we're back on the record.

10 A. Okay.

11 Q. Are you okay to continue?

12 A. Yeah.

13 Q. All right. In our first part of the deposition
14 Mr. Downey did a good job of going over some admonitions
15 for you. I wanted to go over some of my own.

16 You are currently at your home; is that correct?

17 A. Yes.

18 Q. Okay. Please understand that even though we are
19 in an informal setting everything you say here is just
20 as important as if we were at trial in a courtroom with
21 a judge and jury listening; do you understand that?

22 A. Yes. Thank you.

23 Q. Do you understand that if your testimony at trial
24 is inconsistent with the answers that you provide in

1 this deposition today I'll argue to a jury that any
2 inconsistent testimony raises questions about your
3 credibility?

4 A. Okay.

5 Q. Do you understand that if your testimony today or
6 at trial is inconsistent with video recordings showing
7 your arrest on July 7th, 2022, I will argue to a jury
8 that any inconsistent testimony raises questions about
9 your credibility?

10 A. Okay.

11 Q. I'm going to give each of your words their most
12 common meaning unless you tell me that a word has a
13 special meaning, unless you're using a word in some way
14 that is special to you; do you understand that?

15 A. Yes, I think.

16 Q. Basically I'm going to use the dictionary
17 definition of your words unless you tell me that you're
18 using a word in some other way; do you understand that?

19 A. Yes.

20 Q. Okay. The Trumbull County commissioner meetings
21 are held at the Trumbull County administration building
22 on the fifth floor of 160 High Street Northwest, Warren,
23 Ohio, correct?

24 A. I'm not sure the direction, is that right, I

1 think it's 160. I don't know the direction.

2 Q. Do you know where the Trumbull County
3 administration building is?

4 A. Yes.

5 Q. Okay. What street is it on?

6 A. High Street.

7 Q. You don't know the address, though?

8 A. I said I'm not sure the direction.

9 Q. Oh.

10 A. 160, but I'm not sure you said south or north,
11 I'm not sure.

12 Q. All right. But you're familiar with the
13 administration building in Trumbull County, correct?

14 A. And I want to say I don't remember, not that I
15 don't know so I don't know the direction.

16 Q. Okay. Are you familiar with the administration
17 building in Trumbull County?

18 A. Yes.

19 Q. Okay. And the specific room where the Trumbull
20 County commissioner meetings are held is called the
21 commissioners' hearing room; is that correct?

22 A. It's the commissioners' hearing room and it's the
23 commissioners' conference room.

24 Q. Okay.

1 A. There's two separate signs on the door. One door
2 says hearing room. One door says conference room but we
3 call it the hearing room when it's opened up.

4 Q. If I use the term commissioners' hearing room, do
5 you know which room I'm referring to?

6 A. Yes.

7 Q. Okay. During the commissioners' meeting on
8 July 7th, 2022, Sergeant Wix approached your chair and
9 asked you to stand up, correct?

10 A. Yes.

11 Q. And you stood up on your own, correct?

12 A. After the chair was pulled, yes.

13 Q. You then walked out of the commissioners' hearing
14 room on your own, correct?

15 A. Yes.

16 Q. Neither Sergeant Wix nor Sergeant Ross ever
17 touched your body in the commissioners' hearing room on
18 July 7th, 2022, correct?

19 A. Wix touched the chair that was connected to me
20 and I felt that being yanked, so him physically touching
21 me, I don't recall him physically touching me. I
22 remember feeling jarred and that that was actually from
23 him pulling the chair.

24 Q. Sergeant Ross never touched your body in the

1 commissioners' hearing room on July 7th, 2022, correct?

2 A. I don't remember. I don't remember. I don't
3 remember. I don't remember when they took my arm. I
4 think it was in the back.

5 Q. In the hallway outside of the commissioners'
6 hearing room you were placed under arrest, correct?

7 A. Right.

8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

11 Q. You agree with me you asked to have the handcuffs
12 loosened, correct?

13 A. Yes.

14 Q. And less than one minute after you made that
15 request, according to the video, Sergeant Ross removed
16 your handcuffs and rehandcuffed you using two sets of
17 cuffs so that your arms were by your side and not behind
18 you, correct?

19 A. They were not by my side. They were still behind
20 me, but it was more room.

21 Q. Sergeant Ross asked you "Is that better?"
22 Correct?

23 A. Yes, it was better.

24 Q. You responded "Yes," correct?

1 A. I said yes, it was better, uh-huh.

2 Q. Once you got inside the jail your handcuffs were
3 removed, correct?

4 A. Yes.

5 Q. Between the time that Sergeant Ross loosened your
6 handcuffs and the time that your handcuffs were removed
7 in the jail you never made any other complaints about
8 your handcuffs to either Sergeant Ross or Sergeant Wix,
9 correct?

10 A. Correct.

11 Q. Other than placing handcuffs on you neither
12 Sergeant Ross or Sergeant Wix applied any other force to
13 you, correct?

14 A. Correct.

15 Q. In fact, the surveillance video from the
16 commissioners office shows that you walked unassisted to
17 the jail, correct?

18 A. I don't remember. I don't recall force.

19 Q. Once you got to the jail Sergeant Ross and
20 Sergeant Wix left you in the custody of the sheriffs
21 personnel at the jail, correct?

22 A. Right.

23 Q. Earlier -- well, strike that.

24 And to your knowledge after Sergeant Ross and

1 Sergeant Wix dropped you off at the jail they left you
2 at the jail or they left the jail, correct?

3 A. I was told what was -- yeah. Yeah.

4 Q. You were placed in a holding cell at the jail; do
5 you recall that?

6 A. Yes.

7 Q. You were seen by a nurse in the holding cell,
8 correct?

9 A. No.

10 Q. Earlier you mentioned that they took your blood
11 pressure at the jail; do you recall that?

12 A. Yes.

13 Q. And that was done by the nurse, correct?

14 A. No.

15 Q. It was not done by the nurse?

16 A. No.

17 Q. Who took your blood pressure at the jail?

18 A. I don't remember her name, but that's the problem
19 at Trumbull County, they call people nurses to make you
20 believe you have someone qualified to do a medical
21 assessment, and it was someone, they go to ETI on a
22 nine-week program. It's not a nurse. It's not an LPN.
23 It's not an RN. It's not a nurse's assistant. It's
24 like I don't understand how they got away with having

1 people without qualifications do things without
2 supervision. But I don't know -- I know she wasn't a
3 nurse.

4 Q. That's a fair point.

5 A. She was an employee of Dr. Malvasi, can I say
6 that.

7 Q. Well, I don't know. I guess that's a fair point.
8 What I recall seeing on the video was a woman in red or
9 maroon scrubs; do you remember that?

10 A. I remember a woman, yeah.

11 Q. Okay. Is the woman in the scrubs the person that
12 took your blood pressure?

13 A. I don't have the video to know how many
14 different -- I can't be conclusive, but there was a
15 woman there that I don't know. I don't know.

16 Q. Okay.

17 A. If you show me the video, I could tell you a
18 definitive answer. I think she had glasses.

19 Q. I just want to make sure I'm clear on your
20 testimony about water at the jail. Is it your testimony
21 under oath today that you didn't drink any water at the
22 jail?

23 A. I tried to drink the water. [REDACTED]
24 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]

15 Q. While you were in the holding cell you were
16 provided with a cup, I believe an orange cup; do you
17 recall that?

18 A. Yes, very later on.

19 Q. And if I also recall correctly you filled that
20 cup up with water and drank from it, correct?

21 A. Yes.

22 Q. Were you also provided with a sack lunch at the
23 jail?

24 A. Yes, I was provided with a sack lunch at the

1 jail, none of which I was really able to eat, though,

2 [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q. And to be clear, at that point Sergeant Wix and
8 Sergeant Ross weren't present anymore as far as you
9 knew, correct?

10 A. I didn't see them. I only heard where they went.
11 I heard that they went to work together to write the
12 report and that's why it was taking so long, longer than
13 normal to let me out was because they were figuring out
14 what they were writing.

15 Q. On July 7th, 2022, Sergeant Ross never demanded
16 that you apologize to the sheriff, correct?

17 A. No, he did not.

18 Q. On July 7th, 2022, Sergeant Wix never demanded
19 that you apologize to the sheriff, correct?

20 A. I don't recall him saying that.

21 Q. For the --

22 MR. BETRAS: Don't worry, Niki, I'm still here.
23 I just shut my camera off. I'm hearing everything and
24 seeing everything .

1 Q. It is your belief that Mauro Cantalamessa was
2 texting one of the deputies during the meeting; is that
3 correct?

4 A. I thought that he might have been. I know he was
5 texting people related to removing me because of the
6 timing of what he said, but I might -- but I'm not sure
7 who all was communicated with who because there were
8 other elected officials, other department heads, other
9 employees, you know, his brother, there were a lot of
10 people associated with coordinating my arrest.

11 Q. Are you aware that the phone records that your
12 counsel subpoenaed don't show any text messages on July
13 7th between Mauro Cantalamessa and either Deputy -- or
14 Sergeant Ross or Sergeant Wix?

15 A. Yes.

16 Q. You're aware of that, okay. There was some
17 testimony about a March 9th, 2023, either meeting or
18 workshop; do you recall that?

19 A. I don't know.

20 Q. Let me make sure I have the right date.

21 A. What's the content?

22 Q. It's the one involving your phone and the
23 sheriff.

24 A. Yes, okay. That might be. I want to say I could

1 stipulate that there is a meeting involving the sheriff
2 related to the budget.

3 Q. Okay.

4 A. And I don't know the exact date, but it was
5 March, I believe.

6 Q. Okay. All I wanted to ask you is Sergeant Wix
7 and Sergeant Ross were not present at that meeting,
8 correct?

9 A. No, they were not there. It was only Sheriff
10 Monroe.

11 Q. On July 7th, 2022, the clerk, Paula Vivoda-Klotz
12 was reading a letter from Sheriff Monroe, correct?

13 A. Right.

14 Q. You thought that the letter was dishonest,
15 correct -- strike that. Let me make that clear.

16 You thought that the letter from Sheriff Monroe
17 was dishonest, correct?

18 A. It absolutely was dishonest if you compare it
19 even to the audio because the audio shows that only a
20 small clip was taken where the inmate -- they quoted the
21 inmate as saying the sheriff is doing a good job and
22 then cut it right there, but the whole quote was for
23 himself but not for us and that shows the level of
24 intended deception by the sheriff and that that was, in

1 fact, dishonest and taken out of context along with
2 other things.

3 Q. You also thought that the letter was being read
4 out of order, correct?

5 A. The letter shouldn't have been read at all by our
6 staff. Whether or not -- if it was being recognized as
7 a public comment it should have been at the end by the
8 public or if the -- because it wasn't on the agenda and
9 it was being read in the middle of our agenda before we
10 were even completed with our numbered items.

11 Q. So there may have been an appropriate time to
12 read the letter, but you didn't think that that was the
13 appropriate time, correct?

14 A. Absolutely not. You can get a copy of the agenda
15 too, it's online too, to show which number that they
16 started reading it in between.

17 Q. But you would agree with me as you testified a
18 few moments ago that the time for public discourse is
19 during the public meeting, correct?

20 A. For public, no, for public discourse it's during
21 the meeting in the area for public comment which is
22 after the agenda is complete. Albeit they do do things
23 out of order. The meetings deteriorate and run amuck
24 but never -- we do not have public comments or letters

1 being read like that inserted into the middle of the
2 meeting while we're still going over the agenda. That
3 wasn't even on the agenda, I'm sorry.

4 Q. And you don't deny that you interrupted the
5 clerk's reading of the letter, correct?

6 A. That I interrupted her reading of the -- correct,
7 and I was interrupted and yelled at and insulted during
8 that meeting and numerous other meetings but there was
9 never any consequence for anyone else unless their
10 speech was critical of the operations of the county,
11 especially the sheriff.

12 Q. Did you make a motion to return to the proper
13 order?

14 A. Did I make a motion, I think I said order or I
15 suggested -- I can't remember exactly, but I believe
16 that what I said would have constituted me drawing
17 attention to the president that we were not in the order
18 of the day, and that then is not something that the
19 president can overrule. It has to be done by a vote of
20 the board like, yeah, we are out of order and then you
21 have the duty to bring the meeting back on track to the
22 best of your ability.

23 Q. While Mr. Downey was questioning you you
24 mentioned that you recently saw deputies Wix and Ross

1 together and said something lighthearted to them; do you
2 recall that?

3 A. Yes.

4 Q. Where did that encounter take place?

5 A. By my building which was odd because I don't see
6 them together like that, and I got nervous.

7 Q. But -- I'm sorry, go ahead.

8 A. I've seen Ross separately before and outside of a
9 work environment and he's been cordial and polite, but
10 when I see them together at our building I recognize
11 them as arms and hench people of the sheriff and so
12 that's concerning to me, but when I -- you know, there's
13 like a -- even if I'm walking around the courthouse or
14 something and then I see a sheriff deputy I feel -- I
15 don't want to talk about it now.

16 Q. Did you make a comment to Sergeants Ross and Wix
17 about arresting you because you were wearing white after
18 Labor Day?

19 A. Yes, I was nervous. I saw them, I was wondering
20 what they were going to do or why they were there, and
21 so as they were approaching I said that and then that
22 softened their demeanor. And then I was like, okay,
23 they're not going to do anything to me.

24 Q. Was your purpose in making that comment to mock

1 them?

2 A. No, my purpose for making that comment was to
3 evaluate what their purpose was or to sort of make sure
4 that they weren't there to harass me or arrest me or do
5 anything like that.

6 Q. Were you aware that you're not supposed to be
7 talking to them at all?

8 A. No, I'm sorry, I guess --

9 MR. BETRAS: I'm going to object to that
10 question.

11 Go ahead and answer. I don't want you to
12 discuss, Niki, any conversations or any legal advice
13 either I or Matt gave you.

14 Q. And I don't want you to either, but I think I got
15 your answer to that.

16 So, sorry, I'm jumping around a little bit. I
17 made notes while Mr. Downey was talking.

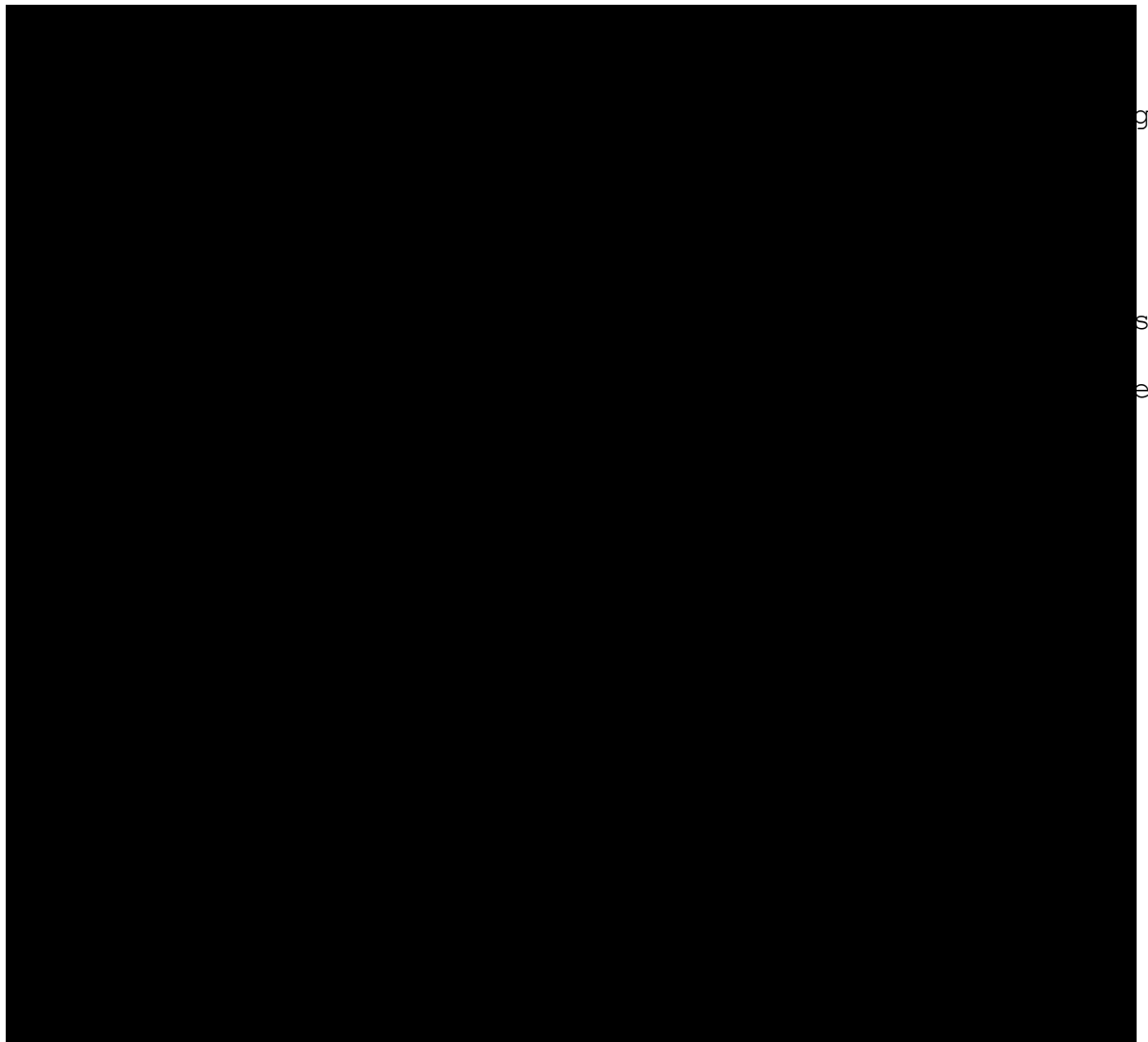
18 On July 7th, 2022, during your arrest or when you
19 were being arrested in the hallway Sergeant Wix offered
20 to call the paramedics for you, correct?

21 A. Yes.

22 Q. And he also told you that you would be seen by
23 the jail medical personnel, correct?

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Q. Well, the fact is you didn't ask him to call a squad, correct?

A. Right.

Q. Okay. And you didn't need a paramedic at that point, correct?

A. No,



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[REDACTED]

Q. It's my understanding that you testified earlier that prior to the July 7th, 2022, meeting there had been no deputies at the commissioners' meetings for nine months to a year; is that correct?

A. The week before -- no, that's not correct.

Q. Okay. The nine months to a year that there were no deputies, when was that?

A. That was the week before. I believe that originally it was Timko and Kaintz who were supposed to be doing the arrest because they were there the week before but I was too sick, they knew I was too sick, the clerk told me not to come in and Wix and Ross ended up there the next week to carry out what needed -- what they believed they needed done.

And the week before was the day, the first day in approximately nine months that someone had been there and it was the week before that.

Q. Okay.

A. The week before July 7th, the week before they arrested me. It was shocking because -- it was shocking to walk in and see -- the one guy's horrible. I couldn't believe he was there. I was like something is up, and I knew something was up.

1 Q. All right. Just for my own mind --

2 A. Timko.

3 Q. So the week before the July 7th meeting there
4 were deputies present?

5 A. Yes.

6 Q. All right. But then in the nine months to a year
7 before that there were no deputies present; is that
8 right?

9 A. Yes.

10 Q. Okay. Prior to July 7th, 2022, did you know
11 Sergeant Wix?

12 A. No, I don't think I knew him.

13 Q. Okay. And you didn't have any reason to believe
14 that Sergeant Wix harbored any animosity towards you,
15 correct?

16 A. I don't know him.

17 Q. Did you know Bobby Ross prior to July 7th, 2022?

18 A. No, again, I don't think so.

19 Q. And so no reason to believe that he harbored any
20 animosity towards you prior to July 7th, correct?

21 A. No.

22 MR. YOSOWITZ: If you'll give me a minute or a
23 couple minutes, Ms. Frenchko, we can go off the record.
24 I might be just about through, okay. We'll just take a

1 couple minutes.

2 (Recess taken.)

3 MR. YOSOWITZ: Back on the record.

4 Q. (By Mr. Yosowitz) When you recently encountered
5 Sergeants Wix and Ross near the administration building
6 did you know that they were responding to a 911 call for
7 service about a woman in distress?

8 A. No.

9 MR. YOSOWITZ: Okay. I don't have anything
10 further.

11 MR. DOWNEY: We don't have any additional
12 questions, David, so if you want to instruct your client
13 on signature.

14 MR. BETRAS: Before we go off record, Dan, would
15 you just tell me or remind me, there's a couple things
16 you asked me for, I want to make sure, there was a
17 hospital bill that you asked me to try to get from Niki.

18 MR. DOWNEY: The urgent care bill, if she went to
19 urgent care I would think there would have to be a
20 record of it either by paying it or getting something
21 from them so if she could look for that we would
22 appreciate it.

23 MR. BETRAS: Was there anything else?

24 MS. SUDHOFF: We need the mailed copy of her

1 medical authorization so I'll follow up my email where
2 she can send that.

3 MR. BETRAS: Did you hear that, Niki? Niki can't
4 scan.

5 MS. SUDHOFF: She can mail the physical copy to
6 us.

7 MR. BETRAS: Do you hear that, Niki?

8 THE WITNESS: Okay.

9 MR. BETRAS: The other thing, Niki, is you have a
10 right to read it.

11 THE WITNESS: Yes.

12 MR. BETRAS: You want to read it, right?

13 THE WITNESS: Yes.

14 MR. BETRAS: Once the court reporter gives it to
15 us, you don't have a -- what's the rule for her to get
16 it back to you?

17 THE REPORTER: 30 days.

18 MR. BETRAS: We don't have 30 days. Our briefs
19 are due on the 24th so, Niki, with all due haste you
20 have to review it, okay?

21 THE WITNESS: Uh-huh.

22 MR. BETRAS: We're not going to waive signature.
23 She wants to read.

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A F F I D A V I T

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State of _____)
County of _____) SS:

I, Michele Nicole Frenchko, do hereby certify that I have read the foregoing transcript of my deposition given on October 11, 2023; that together with the correction page(s) attached hereto noting changes in form or substance, if any, is true and correct.

Michele Nicole Frenchko

I do hereby certify that the foregoing transcript of the deposition of Michele Nicole Frenchko, was submitted to the witness for reading and signing; that after she had stated to the undersigned Notary Public that she had read and examined her deposition, she signed the same in my presence on the ____ day of _____, 2023.

NOTARY PUBLIC

My commission expires _____

C E R T I F I C A T E

State of Ohio)
) SS:
County of Franklin)

I, Connie M. Willman, Notary Public in and for the State of Ohio, duly commissioned and qualified, certify that the within named Michele Nicole Frenchko was by me duly sworn or affirmed to testify to the whole truth in the cause aforesaid; that the testimony was taken down by me in stenotypy in the presence of said witness; afterwards transcribed upon a computer; that the foregoing is a true and correct transcript of the testimony given by said witness taken at the time and place in the foregoing caption specified.

I certify that I am not a relative, employee, or attorney of any of the parties hereto, or financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Columbus, Ohio, on this 16th day of October, 2023.



Connie M. Willman, Notary Public in
and for the State of Ohio and
Registered Professional Reporter and
Registered Merit Reporter.

My commission expires January 18, 2028.

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